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TECHNICAL APPENDIX A

A-1 Scoping Document
A-2 Notice of Preparation/ Notice of Intent and Responses
A-3 Alternative Imperial County Landfill Site Selection Study

Environmental Impact Statement &
Environmental Impact Report
for the proposed

Mesquite Regional Landfill

Imperial County, California

SCH. No. 92051024
BLM No. CA-060-02-5440-10-B026

Prepared by the
Bureau of Land Management
California Desert District

and the
County of Imperial
Planning & Building Department

Environmental Consultant
The Butler Roach Group, Inc.
San Diego, California

April 1994

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TECHNICAL APPENDIX A

A-1 SCOPING DOCUMENT

A-2 NOTICE OF PREPARATION/NOTICE OF INTENT AND RESPONSES

A-3 ALTERNATIVE IMPERIAL COUNTY LANDFILL SITE SELECTION STUDY

ENVIRONMENTAL IMPACT STATEMENT
ENVIRONMENTAL IMPACT REPORT

for the proposed

MESQUITE REGIONAL LANDFILL

IMPERIAL COUNTY, CALIFORNIA

SCH. No. 92051024
BLM No. CA-060-02-5440-10-B026

prepared for

BUREAU OF LAND MANAGEMENT
California Desert District
1661 S. 4th Street
El Centro, California

and

COUNTY OF IMPERIAL
Planning And Building Department
939 Main Street
El Centro, California

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MESQUITE REGIONAL LANDFILL EIS/EIR

APPENDIX A-1

SCOPING DOCUMENT

SCOPING MEETINGS SUMMARY

MAY 27 & MAY 28, 1992

INTRODUCTION

Two community scoping meetings were conducted on May 27 and 28, 1992. The purpose of these public meetings was to solicit and receive public input on the environmental concerns that should be addressed in the EIS/EIR being prepared by the Bureau of Land Management and the County of Imperial for the proposed new Mesquite Regional Landfill.

The meetings were conducted by the Bureau of Land Management. A brief informational presentation was followed by approximately two hours of discussion by members of the community who attended the meetings, and enumerated their concerns. The following is a list of the meetings:

The first community scoping meeting was held at the El Centro Community Center in El Centro, California on May 27, 1992 at 7:00 p.m. Approximately 60 people were in attendance, and about 40 people spoke.

The second scoping meeting was held at the Desert Expo Center on May 28, 1992 at 7:00 p.m. Approximately 16 people were in attendance, and about 15 people spoke.

This scoping document summarizes the comments received at the scoping meetings. A copy of the handout, which was the same for both meetings, follows this introduction. This scoping document is organized by meeting, with each section containing the following material:

- A summary of the key points made by speakers individual comments.
- A copy of the sign-in sheet and speakers slips. (Note: not all speakers completed speaker slips.)
- Copies of written comments and correspondence received at the scoping meeting or subsequent to the meeting.
- Summary tables of the individual comments received in response to the El Centro and Indio scoping meetings. The individual comments were categorized as follows: A = Already Addressed; B = New Scoping Issue; or C = Not to be included in the EIS/EIR. Finally, the summary tables identify where in the EIS/EIR the issue is addressed.

PROPOSED
MESQUITE REGIONAL LANDFILL ENVIRONMENTAL IMPACT STATEMENT/ ENVIRONMENTAL IMPACT REPORT

PUBLIC SCOPING MEETING

UNITED STATES DEPARTMENT OF INTERIOR
BUREAU OF LAND MANAGEMENT
EL CENTRO RESOURCE AREA
333 SOUTH WATERMAN AVENUE
EL CENTRO, CALIFORNIA 92243-2298

EL CENTRO COMMUNITY CENTER

May 27, 1992
7:00 P.M.

DESERT EXPO CENTER, INDIO

May 28, 1992
7:00 P.M.

PUBLIC MEETING AGENDA

MESQUITE REGIONAL LANDFILL
ENVIRONMENTAL IMPACT STATEMENT/
ENVIRONMENTAL IMPACT REPORT

I. PRELUDE

- Attendees are requested to sign in and fill out registration cards if they wish to speak.

II. INTRODUCTION

- Bureau of Land Management will welcome all to meeting, explain meeting format, introduce representatives, and explain responsibilities.

III. MESQUITE REGIONAL LANDFILL OVERVIEW

- Project Representative will give an overview of the proposed Mesquite Regional Landfill Project.

IV. ENVIRONMENTAL PROCESS

- Project Representative will describe environmental review process.

V. PUBLIC COMMENTS

- The meeting will be open to public comment.

VI. CONCLUSION

- Bureau of Land Management will explain when the next opportunity for public comment/review will be.

PUBLIC SCOPING MEETING AND PROCEDURES

The purpose of this meeting is to solicit comments from community interest groups, individuals, elected officials, and governmental agencies on the scope of issues to be addressed in a combined Environmental Impact Statement/Environmental Impact Report (EIS/EIR). The EIS/EIR will evaluate potential environmental effects of a proposed regional landfill to be located contiguous to the site of the currently operating Mesquite Gold Mine and Ore Processing Facility in an isolated portion of eastern Imperial County.

The National Environmental Policy Act requires public scoping throughout the EIS process. Guidelines for the California Environmental Quality Act encourage public scoping of an EIR though it is not specifically required. The purpose of the scoping process is to identify public and agency concerns, clearly define the environmental issues and alternatives, identify related issues, and identify state and local agency requirements which must be addressed in the EIS/EIR. Following the public scoping process, a Draft EIS/EIR will be prepared and made available for public review and comment. There will be a public hearing to provide an opportunity for public comment on the Draft EIS/EIR. The Final EIS/EIR will reflect both oral and written comments received on the Draft EIS/EIR.

If you wish to comment on one or more issues that should be addressed in the EIS/EIR, complete the attached SPEAKER'S CARD and present it to a Bureau of Land Management representative at this meeting. Verbal comments of considerable length should also be submitted in writing, either at this meeting or by mail to reference BLM-CA 29617, Bureau of Land Management, Area Manager, El Centro Resource Area, 353 South Waterman Avenue, El Centro, California, 92243-2298. It is requested that written comments be received by June 12, 1992.

If you wish to be placed on the mailing list for future notification of meetings and document availability, please print your name and mailing address on the ATTENDEE LIST at the entrance table.

Thank you for your attendance and participation.

1.0 INTRODUCTION

To comply with the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA), the Bureau of Land Management and the County of Imperial are preparing a joint Environmental Impact Statement and Environmental Impact Report (EIS/EIR) to evaluate the potential environmental impacts of the proposed Mesquite Regional Landfill.

Issues to be addressed in the EIS/EIR are being identified as a result of staff review, consultation with other agencies, and this public scoping meeting. The issues raised during this public scoping meeting will be incorporated into the analyses of potential environmental impacts in the EIS/EIR. A Draft EIS/EIR will be circulated to interested agencies and public for review and comment. A Final EIS/EIR will be prepared to respond to the comments received on the Draft EIS/EIR. The completed EIS/EIR will be utilized by local, state, and federal agencies in the permit review process.

The following paragraphs briefly describe the proposed project and the environmental review process.

2.0 PROJECT DESCRIPTION

Gold Fields Mining Co. (Gold Fields), Western Waste Industries, and S.P. Environmental Systems have formed a partnership (Partnership) that would own and develop a regional landfill located contiguous to the site of the currently operating Mesquite Gold Mine and Ore Processing Facility (Mesquite Mine) in eastern Imperial County. The proposed landfill would be located primarily on the site of the Mesquite Mine in an isolated portion of eastern Imperial County (Figure 2.1). The nearest residences would be more than 3 and 3.5 miles from the proposed landfill.

The cities of Brawley and Palo Verde are located approximately 35 miles to the west and northeast, respectively. In addition to the existing mining operation, other land uses near the project area include: (1) the Chocolate Mountains Aerial Gunnery Range, immediately north of the Mesquite Mine, which is actively used for military aircraft training, (2) gravel borrowing from federal land immediately to the west of the Mesquite Mine which has been designated as a gravel withdrawal area by the BLM, and (3) recreational vehicle activity (primarily weekends) in the Imperial Sand Dunes Recreation Area further to the west (approximately seven to eight miles from the proposed project site).

Excavated materials from the mine, which has been operated by Gold Fields since 1985, would be used for most of the daily, intermediate and final cover requirements at the proposed landfill, resulting in the productive utilization of a large portion of the mine overburden and ore residue piles. Claystone portions of the overburden removed from the mine pit areas would be used to construct clay sections of the landfill base liner. Approximately 600 million tons of Class III municipal solid waste (MSW) would be deposited at the landfill, which could operate for approximately 100 years. The landfill would be designed to extend above the existing desert floor elevation to maintain large separations above the limited ground water resources in the area. The landfill will not be located in the existing mine pits which are still in operation.

The project would also include a four- to five-mile (approximate, depending on final alignment) railroad spur extending from the existing Southern Pacific main line track to a special container handling facility (intermodal), constructed at the landfill to facilitate MSW delivery and handling. The MSW would be transported to the new spur over existing rail systems from various locations in southern California. The spur alignment would be designed to follow natural topography and drainages, minimize new disturbance of land, and avoid interference with existing recreational activities near Highway 78. The MSW would be transported in completely enclosed transport containers or specially designed rail cars.

Two project configurations are being evaluated. One project configuration, referred to as Project "A," is located on land owned by Gold Fields, except for four small parcels (about 100 acres) of federal land within the proposed boundary. The other project configuration, referred to as Project "B," consists of the area proposed for Project "A" plus an additional 1,742 acres of adjacent lands which are also currently owned by the federal government and managed by the BLM. Though they would involve different configurations, both Project "A" and Project "B" would function in very much the same way, operationally.

The proposed exchange of land would allow Gold Fields to obtain ownership of all land contained within either the Project "A" or "B" boundaries, depending upon the finally determined project configuration. The land offered for exchange has been selected to enhance protection of important habitat, or enhance the BLM's ability to manage federally-owned scenic areas. Final selection of the project configuration will be determined after the CEQA and NEPA public review processes.

The proposed landfill would be constructed and operated using state-of-the-art engineering and regulatory procedures, to meet strict federal and state guidelines for landfill construction and operation, and safeguard against contamination of the environment. For the Mesquite Regional Landfill, ground water resources would be protected by a specially designed impermeable liner and overlying leachate collection system constructed prior to placement of the MSW. Initially, the liner would be a composite system of low permeability clay and very low permeability synthetic material. Modifications to the liner system would be made in the future, as appropriate, to suit operational experiences and new synthetic materials which may be developed during the 100-year landfill life.

A gas collection system would be constructed as the landfill cells are developed. Collected landfill gas would be controlled by an onsite flare system, used to generate electricity for onsite use and/or offsite sale, or processed for use as commercial grade fuel. Ground water, gas and vadose zone (if appropriate) monitoring systems would be provided to demonstrate adequacy of the landfill design and operation.

Drainage on and around the landfill would be controlled with constructed channels and berms designed to become part of the extensive flood diversion system in the area which has been developed for the Mesquite Mine. Drainage of rainfall directly onto the landfill would be controlled by a system of benches, berms, protected ditches, and pipes, which would direct water away from exposed trash and into the flood diversion channels. Water that occasionally reaches small uncovered trash working areas would be collected and sent to an onsite treatment plant.

Potential issues include, but are not limited to, air quality, social and economic impacts, ground and surface water quality, desert tortoise, cultural or historical resources, and recreation values. Potential benefits include tax receipts and revenues from waste disposal fees, potential increased employment, purchases of supplies and services from local vendors in connection with landfill operations, and the availability of the regional landfill for disposal of local wastes.

3.0 ENVIRONMENTAL REVIEW, AND PROJECT PERMITTING PROCESS

The BLM and the County of Imperial have signed a Memorandum of Understanding which provides for them to collaborate in the preparation of a joint EIS/EIR that would satisfy the NEPA and CEQA environmental review processes. A third-party environmental review consultant will be hired to assist the County and the BLM in their analysis of the environmental impacts of the proposed Mesquite Regional Landfill. Issues currently determined to be addressed include:

- Geology and Soils
- Surface Water Resources
- Ground Water Resources
- Biological Resources
- Air Quality/Odors
- Socioeconomics
- Public Services
- Environmental Health and Safety
- Land Use/Community Character
- Paleontological Resources
- Cultural Resources
- Utilities
- Energy
- Visual Resources/Scenic Quality
- Noise
- Transportation

All proposed actions on or affecting public lands or resources under BLM jurisdiction must be reviewed for potential environmental impacts under NEPA. As a result, in compliance with NEPA, the BLM will participate in the preparation of a combined EIS/EIR to evaluate the potential environmental impacts of the proposed Mesquite Regional Landfill which will require the following actions affecting public lands:

- A right-of-way to allow a rail spur to be constructed across federal land that would connect the proposed landfill to the existing Southern Pacific main line track near Glamis in Imperial County.
- An exchange of land to allow the Landfill Partnership to consolidate ownership of land within the proposed project boundaries. The land offered for exchange has been selected to enhance protection of important habitat, or enhance the BLM's ability to manage federally-owned scenic areas.

This public scoping meeting is the first step in the EIS process, as required by NEPA.

The requirements of CEQA must be satisfied for projects in the State of California where a decision is required by a public agency. The proposed Mesquite Regional Landfill will require a number of permits from local and state agencies before it can be constructed and begin operation. As a result, the Imperial County Planning Department, as Lead Agency for CEQA purposes, will manage the county's effort in the preparation of a combined EIS/EIR to evaluate the potential environmental impacts of the proposed Mesquite Regional Landfill. Though not specifically required by CEQA, participation in this public scoping meeting is the county's first step in the preparation of the EIR.

Once the CEQA environmental review process is complete, a number of state and local agencies will consider applications for a series of required permits for the proposed landfill, which include the following major permits:

- A Conditional Use Permit (CUP) from the Imperial County Planning Division.
- Waste Discharge Order (WDO) from the Regional Water Quality Control Board (RWQCB).
- A Permit to Construct and a Permit to Operate from the Imperial County Air Pollution Control District (APCD).
- A Solid Waste Facility Permit (SWFP) from the Local Enforcement Agency (LEA) as authorized by the California Integrated Waste Management Board. In Imperial County, the LEA is the Imperial County Environmental Health Division.

The environmental review and project permitting activities are expected to last well into 1993.

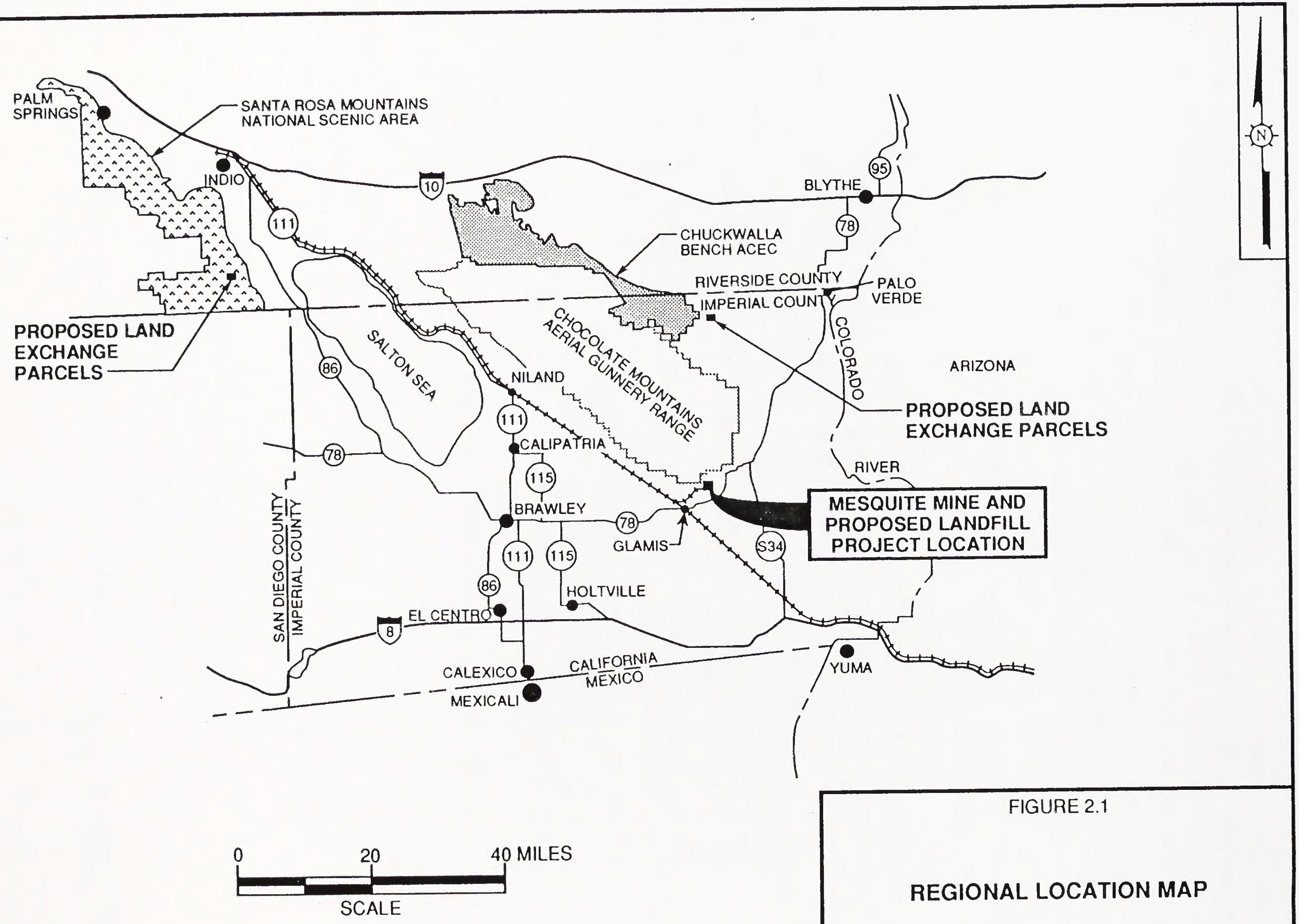

FIGURE 2.1

REGIONAL LOCATION MAP

WRITTEN STATEMENT

MESQUITE REGIONAL LANDFILL EIS/EIR

Submit to BLM representative at Scoping Meeting or mail to: Reference BLM-CA 29617 Area Manager, Bureau of Land Management, El Centro Resource Area, 333 South Waterman Avenue, El Centro, California, 92243-2298. Mailed statements should be postmarked no later than June 12, 1992.

Submitted By:

Name (please print)

Street Address

City State Zip

MESQUITE REGIONAL LANDFILL EIS/EIR

PUBLIC SCOPING MEETING SPEAKER'S CARD

PLEASE FILL OUT AND SUBMIT THIS CARD TO A BLM REPRESENTATIVE IF YOU WISH TO SPEAK.

Your name will be called during the public comment period of the meeting.

(please print)

Name: ______________________________

Street Address: ______________________________

City: ______________ State: ____________ Zip: __________

Representing: ______________________________

____

Issue(s) of Concern: ______________________________

____

ADVISORY: Depending upon the number of persons wishing to comment, presentations may be limited to three minutes.

Mesquite Regional Landfill Project EIS/EIR
El Centro Public Scoping Meeting
El Centro Community Center, El Centro

May 27, 1992 7:00 p.m.

EL CENTRO SCOPING MEETING
Key Points Made By Speakers

1. Address the risk of earthquakes in the area.
2. Address the wildlife in the desert (impacts).
3. What are the impacts on jobs, tax base, buying power, wages?
4. Address environmental activities of the mine to date.
5. Utilize existing data for the site.
6. Work initiated by various agencies.
7. Opportunity to support research conducted on Big Horn Sheep.
8. Impacts on Burro Deer Herd (fawning practices).
9. Impacts on access to natural/artificial water resources.
10. Impacts to wildlife resources.
11. Blowing trash.
12. Flash floods.
13. Flora/fauna (loss of).
14. Why here? Why not Los Angeles?
15. Why is Gold Field building here? (Economics).
16. Economic benefit to Imperial County.
17. History of Western Waste.
18. Percentage of proposed workers from Imperial County - Socioeconomic Analysis.
19. Potential for leakage and impacts on the Salton Sea.
20. Types of jobs that would be created broken down by wages/earnings.
21. Tax impacts, benefit to local businesses.
22. Assess the impact of the recent drought on groundwater table.
23. Source of water to be used on-site. Treatment of water to be used on-site.
24. Source of cover/liner. What is it, has it been treated, is it contaminated?
25. How will we know if project has worked as proposed.
26. Independent study of sub-basin.
27. Effect of ground temperature on methane gas extraction.
28 What tests will be done on the cover material (cyanide)?
29. Address recycling/resource recovery (on-site and at the loading docks).
30. Source reduction effects and global impacts.
31. Who will be the watchdogs after landfill closes?
32. How much can be recycled?
33. Will any money be put aside for disasters?
34. Why here? Why Gold Field?
35. Attempts to recycle before trash is placed in sealed containers.
36. How will it be decided what materials are recyclable?
37. What type of trash will be placed in the landfill.
38. How will Imperial County take advantage of the proposed project for their own trash?
39. Economic impact on urban people, cost.
40. How did Gold Field acquire project land/mine?
41. What is projected income of project?
42. What are the cumulative impacts?

EL CENTRO SCOPING MEETING (continued)

43. Gold Field's past record.
44. Identify service area.
45. Identify the recreational use of the area and project's effect on recreational uses.
46. How will landfill look upon completion (revegetation, etc.)?
47. Effect on A.C.E.C. (blowing trash).
48. How will hazardous waste be removed at the source?
49. Monitoring system (extent, duration).
50. What third parties will review monitoring.
51. Who has enforcement authority?
52. What facilitates/causes partial closure?
53. Potential for leachate, off-site groundwater monitoring wells.
54. Effects of lightning strikes on landfill.
55. Mexican Agency contact, translation of EIS/EIR into Spanish.
56. Combustibility of landfill, detection, how fires will be extinguished.
57. Daily rainfall patterns, on-site rainfall monitoring.
58. Provisions to prevent trash blowing.

MEETING ROSTER
MESQUITE REGIONAL LANDFILL
EIS/EIR PUBLIC SCOPING MEETING

NAME	ORGANIZATION	ADDRESS	PHONE NUMBER	TELEFAX NUMBER
Ernest Johnson	Heavy Equipment	1945 W Hamilton	(353-1798	( ) -
Wally Lemke	Mesquite	389 W River Dr Brly	(3)44-8520	( ) -
Leona Lemke	"	389 W River Dr Brawley	(" "	( ) -
Dennis R. Vaughn	GFOC-Mesquite	275 W. E St Brawley	( )344-8653	( ) -
Ernie DALDAGH	Mesquide	689 Holt Holtville CA.	( )356 4463	( ) -
Eva Morales	MESquite	2057 10th AVE YUMA AZ	(602)782-6476	( ) -
John Ottani	Individual	1920 Underwood Rd Holtville	( )356 2361	( ) -
Monta W. Zengerle	MK	126 Wampum Way Seguin, TX	(512)824-0481	( ) -
Randy Rister	Imp Co. F&G Comm	1002 State St El Centro Ca	(619)339-4384	( ) -
Bill Smith	D.W.U.	410 West "C" ST, BRAWLEY	(619) 344-0626	( ) -
Kenneth G Walker	Gold Field	1000 Rodeo Dr Imperial	( )355-1403	( ) -
Beth Jordan	arid Operations	444 S. 8th St Suite B1, El Centro	( )337 5752	( ) -
Mario Partida	Gold Fields	538 Orange ave APT 2 Holtville	( )356 4937	( ) -
Ken [illegible]	Chambers	50 Airport Parkway, San Jose	(408)437-7713	(408)437-4962
[illegible]	Imp Co	660 Olive Holtville	( )356 1490.	( ) -
Kathryn Enders	PRIVATE	1695 A BRAWLEY	( )344 0923	( ) -
KATHERINE HON	CITIZEN OGDEN	5510 MOREHOUSE DR.	(619)458 9044	( ) -
Larry Todd	GFOC-Mesquite	6502 E. Hwy 78 Brawley CA	(619)352 6541	(619)352-8057

2000
Mesquite
Landfill

MEETING ROSTER
MESQUITE REGIONAL LANDFILL
EIS/EIR PUBLIC SCOPING MEETING

NAME	ORGANIZATION	ADDRESS	PHONE NUMBER	TELEFAX NUMBER
Leon Lesicka	Desert Wildlife Un	4780 Hwy 111 Brly	(619)344-2793	( ) -
Janet St. Clair		1724 Olive Ave E.C.	(619)353-4218	( ) -
Jose L. Delgado	Gold Feilds	463 Mesquite Holtville CA	(619)356-2465	( ) -
Robert McKinley	Citizen	P.O. Box 525 Westmorland	( )344-3722	( ) -
[illegible]	Gold Fields	2597 E. Hwy 115 Holtville	( ) 356-1658	( ) -
John Cellegrini	Citizen	2460 State St El Centro	( ) 353-4354	( ) -
PAUL BERRYMAN	CITIZEN	215 W. HAMILTON AV. #B	( )352-1454	( ) -
Stephen Castillo	Citizen	1254 Smoketree Dr. El Centro	(619)352-4160	( ) -
PA Rice	IV. Press	P.O. Box 791, Brawley CA92227	( )344 ~~8~~1221	( )344 1383
Carlos Ayala	Citizen	756 Tangerine Dr. EC	(619) 353-0236	( ) -
Michele Frost	CITIZEN	1070 WENSLEY EL CENTRO	(619)352 7378	( ) -
Dilda McFadden	Citizen	2030 HEIL AVE	( )352-3716	( ) -
Edie Harmon	—	P.O.Box 444 Ocotillo 92259	( ) none	( ) -
James E Harmon	"	P.O. Box 444 OCOTILLO 92259	( ) NONE	( ) -
Joanne Yeager	County Counsel	980 Main Street El Centro	(619)339 4402	( ) -
Mike Stanwood	PM Dredging Assoc	1650 Locust Denver Co 80220	(303)478-9131	( ) -
J.P. Menvielle	FARMER	897 W. Ross Rd E.C.	619,353-1869	( ) -
			( ) -	( ) -

MEETING ROSTER
MESQUITE REGIONAL LANDFILL
EIS/EIR PUBLIC SCOPING MEETING

NAME	ORGANIZATION	ADDRESS	PHONE NUMBER	TELEFAX NUMBER
Dick Kamnis	Kammes Development	1850 Lincoln Sp 213	(619) 352-2377	( ) -
S Fil	Gold Fields	201 W 17 ST	( ) -	( ) -
Phillip De Dycker	DeDycker & Assoc	28710 Denali Ln Evergreen Co 80439	(303) 988. 1429	( ) -
BRUCE KUHN		1240 DREW RD EL CENTRO	(619) 353-3546	( ) -
ROBERT BOWER		229 W ROSS #26C	(619) 352-8712	( ) -
Shanna Bower		" "	( ) -	( ) -
Michael J May	HOMEOWNER	127 E. CALIF ST CALIPATRIA CA	619 ~~(348~~ 348- 5162	( ) -
Roger Shaku	Geothermal	P.O. Box 1139 Brawley, Ca	(619) 344. 4692	( ) -
Abdi Haile	RWQCB (R7)	~~33~~73-271 HWY 111, Ste 21, PD.	(619) 346-7491	( ) -
Chuck Torbin	WWI	1125 W. 190 st GARDENA CA	(310) 329-1425	( ) -
Tim O'Halloran		P.O. Box 577, Imperial CA.	(619) ~~355~~ 352-7235	( ) -
			( ) -	( ) -
Kenneth A Wallen	Gold Field	1000 Rodeo Dr Imperial Calif	( ) 355 1403	( ) -
			( ) -	( ) -
			( ) -	( ) -
			( ) -	( ) -
			( ) -	( ) -
			( ) -	( ) -

MEETING ROSTER
MESQUITE REGIONAL LANDFILL
EIS/EIR PUBLIC SCOPING MEETING

NAME	ORGANIZATION	ADDRESS	PHONE NUMBER	TELEFAX NUMBER
Lupita G. Ortega	CUHS	319 Butterfield Trail	(619) 355-2660	( ) -
A. Ortiz	Mesquite	319 Butterfield Trl	(619) 355-2660	( ) -
Rick Von Pein	CHAMBERS	50 Airport Parkway San Jose 95110	(408) 437-7713	(408) 437-4962
Elizabeth Eden	CITIZEN	PO Box 367 1695 A, Brawley	(619) 344-0903	( ) -
Gerald Quick	Div. of Environmental Health	939 Main St., El Centro	(619) 339-4203	( ) -
Clifford Caldwell	citizen	795 Desert Gardens Dr, EC	(619) 353-3168	( ) -
Rich Roberts	citizen	2290 Elm El Centro	(619) 353 4831	( ) -
Pat Roberts	citizen	2290 Elm Ave El Centro	(619) 353 4831	( ) -
Bob Miller	Citizen	3305 Hwy 115 Holtville	619) 356 5767	( ) -
A. Lamanna	Gbc-Mesquite	6502 E Hwy 78 Brawley CA 92227	(619) 352-6541	( ) -
Jurg Heuberger	Planning Dept	940 Main St, El Centro Ca	(619) 339 4236	(619) 353 8338
Eva Ileen	Co. Employee	540 S. 6th St, El Centro, CA ~~[illegible], El Centro, CA~~	(619) 337-7749	( ) -
John Armas	Public Works	155 S 11th St	(619) 339-4462	(619) 352 1252
Alex Alimohammadi	CSWRCB	73-271 Hwy 111 Ste 21 PD	(619) 346 7491	( ) -
Sam Felix	Gold Fields	201 W 13st Imperial	(619) 353 0233	( ) -
			( ) -	( ) -
			( ) -	( ) -
			( ) -	( ) -

MESQUITE REGIONAL LANDFILL EIS/EIR

PUBLIC SCOPING MEETING SPEAKER'S CARD

PLEASE FILL OUT AND SUBMIT THIS CARD TO A BLM REPRESENTATIVE IF YOU WISH TO SPEAK.

Your name will be called during the public comment period of the meeting.

(please print)

Name: ERNIE DAGDAGAN

Street Address: 689 HOLT APT2

City: Holtville State: CA Zip: 92250

Representing: GOLDFIELDS

Issue(s) of Concern: Employment.

ADVISORY: Depending upon the number of persons wishing to comment, presentations may be limited to three minutes.

MESQUITE REGIONAL LANDFILL EIS/EIR

PUBLIC SCOPING MEETING SPEAKER'S CARD

PLEASE FILL OUT AND SUBMIT THIS CARD TO A BLM REPRESENTATIVE IF YOU WISH TO SPEAK.

Your name will be called during the public comment period of the meeting.

(please print)

Name: Dennis R. Vaughn

Street Address: 275 West E st Apt 222

City: BRAWLEY State: CA Zip: 92227

Representing: Gold Fields Operating Co - Mesquite

Issue(s) of Concern:

ADVISORY: Depending upon the number of persons wishing to comment, presentations may be limited to three minutes.

MESQUITE REGIONAL LANDFILL EIS/EIR

PUBLIC SCOPING MEETING SPEAKER'S CARD

PLEASE FILL OUT AND SUBMIT THIS CARD TO A BLM REPRESENTATIVE IF YOU WISH TO SPEAK.

Your name will be called during the public comment period of the meeting.

(please print)

Name: PAUL BERRYMAN

Street Address: 215 W. HAMILTON AV. #B

City: EL CENTRO State: CA. Zip: 92243

Representing: ONE TAX'PAYER

Issue(s) of Concern: ADVERSE IMPACT ON ENVIORNMENT

ADVISORY: Depending upon the number of persons wishing to comment, presentations may be limited to three minutes.

MESQUITE REGIONAL LANDFILL EIS/EIR

PUBLIC SCOPING MEETING SPEAKER'S CARD

PLEASE FILL OUT AND SUBMIT THIS CARD TO A BLM REPRESENTATIVE IF YOU WISH TO SPEAK.

Your name will be called during the public comment period of the meeting.

(please print)

Name: Al Ortega

Street Address: 319 Butterfield TRL

City: Imperial State: CALIF Zip: 92251

Representing: Gold Fields

Issue(s) of Concern: General community benefit from Employment

ADVISORY: Depending upon the number of persons wishing to comment, presentations may be limited to three minutes.

MESQUITE REGIONAL LANDFILL EIS/EIR

PUBLIC SCOPING MEETING SPEAKER'S CARD

PLEASE FILL OUT AND SUBMIT THIS CARD TO A BLM REPRESENTATIVE IF YOU WISH TO SPEAK.

Your name will be called during the public comment period of the meeting.

(please print)

Name: Janet St. Clair

Street Address: 1724 A Olive Ave

City: El Centro State: Calif. Zip: 92243

Representing: All of us

Issue(s) of Concern: How much will be re-cycled was mentioned. We don't even re-cycle as San Diego county does. Can a trade-off be made so that our re-cyclables are made useful-while we in turn provide a dump site.

ADVISORY: Depending upon the number of persons wishing to comment, presentations may be limited to three minutes.

MESQUITE REGIONAL LANDFILL EIS/EIR

PUBLIC SCOPING MEETING SPEAKER'S CARD

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Your name will be called during the public comment period of the meeting.

(please print)

Name: MICHAEL MAY

Street Address: 127 E. CA. ST.

City: CALIPATRIA State: CA Zip: 92233

Representing:

Issue(s) of Concern: LANDFILL

ADVISORY: Depending upon the number of persons wishing to comment, presentations may be limited to three minutes.

MESQUITE REGIONAL LANDFILL EIS/EIR

PUBLIC SCOPING MEETING SPEAKER'S CARD

PLEASE FILL OUT AND SUBMIT THIS CARD TO A BLM REPRESENTATIVE IF YOU WISH TO SPEAK.

Your name will be called during the public comment period of the meeting.

(please print)

Name: Stephen I Castillo

Street Address: 1254 Smoketree Dr.

City: El Centro State: Ca. Zip: 92243

Representing: myself

Issue(s) of Concern: 1) what attempts will be made to reclaim recylible materials before trash is placed in sealed containers.

2) what type of trash will be placed in land fill. ~~if in 100 years one dies in landfill~~

ADVISORY: Depending upon the number of persons wishing to comment, presentations may be limited to three minutes.

3) How will it be decided what material are recylible.

MESQUITE REGIONAL LANDFILL EIS/EIR

PUBLIC SCOPING MEETING SPEAKER'S CARD

PLEASE FILL OUT AND SUBMIT THIS CARD TO A BLM REPRESENTATIVE IF YOU WISH TO SPEAK.

Your name will be called during the public comment period of the meeting.

(please print)

Name: Bob Miller

Street Address: 3305 Hwy 115

City: Holtville State: CA. Zip: 92250

Representing:

Issue(s) of Concern:

ADVISORY: Depending upon the number of persons wishing to comment, presentations may be limited to three minutes.

MESQUITE REGIONAL LANDFILL EIS/EIR

PUBLIC SCOPING MEETING SPEAKER'S CARD

PLEASE FILL OUT AND SUBMIT THIS CARD TO A BLM REPRESENTATIVE IF YOU WISH TO SPEAK.

Your name will be called during the public comment period of the meeting.

(please print)

Name: CARLOS AYALA

Street Address:

City: State: Zip:

Representing:

Issue(s) of Concern:

ADVISORY: Depending upon the number of persons wishing to comment, presentations may be limited to three minutes.

MESQUITE REGIONAL LANDFILL EIS/EIR

PUBLIC SCOPING MEETING SPEAKER'S CARD

PLEASE FILL OUT AND SUBMIT THIS CARD TO A BLM REPRESENTATIVE IF YOU WISH TO SPEAK.

Your name will be called during the public comment period of the meeting.

(please print)

Name: Robert McKinley

Street Address: 1070 West Main St.

City: Westmorland State: Ca Zip: 92281

Representing: citizen

Issue(s) of Concern: Environmental Impact

ADVISORY: Depending upon the number of persons wishing to comment, presentations may be limited to three minutes.

MESQUITE REGIONAL LANDFILL EIS/EIR

PUBLIC SCOPING MEETING SPEAKER'S CARD

PLEASE FILL OUT AND SUBMIT THIS CARD TO A BLM REPRESENTATIVE IF YOU WISH TO SPEAK.

Your name will be called during the public comment period of the meeting.

(please print)

Name: RICH ROBERTS

Street Address: 2250 ELM

City: El Centro State: CA Zip: 92243

Representing: Citizen

Issue(s) of Concern:

ADVISORY: Depending upon the number of persons wishing to comment, presentations may be limited to three minutes.

MESQUITE REGIONAL LANDFILL EIS/EIR

PUBLIC SCOPING MEETING SPEAKER'S CARD

PLEASE FILL OUT AND SUBMIT THIS CARD TO A BLM REPRESENTATIVE IF YOU WISH TO SPEAK.

Your name will be called during the public comment period of the meeting.

(please print)

Name: Randy Rister

Street Address: 1102 state Street

City: El Centro State: Calif Zip: 92243

Representing: Imperial County Fish & Game Commission & Desert Wildlife Unlimited

Issue(s) of Concern: Wildlife, Habitat, water sources migration

ADVISORY: Depending upon the number of persons wishing to comment, presentations may be limited to three minutes.

MESQUITE REGIONAL LANDFILL EIS/EIR

PUBLIC SCOPING MEETING SPEAKER'S CARD

PLEASE FILL OUT AND SUBMIT THIS CARD TO A BLM REPRESENTATIVE IF YOU WISH TO SPEAK.

Your name will be called during the public comment period of the meeting.

(please print)

Name: JOHN GILLESPIE

Street Address: 2460 STATE

City: EL CENTRO State: CA Zip: 92243

Representing: RESIDENTS TAXPAYERS & VOTERS

Issue(s) of Concern: ENVIRONMENTAL & ECONOMIC

ADVISORY: Depending upon the number of persons wishing to comment, presentations may be limited to three minutes.

THE WILDERNESS SOCIETY

RECEIVED
BUREAU
1992 MAY 21 PM 2:15
EL CEN

May 18, 1992

Ben Koski
Area Manager
Bureau of Land Management
333 South Waterman Avenue
El Centro, CA 92243-2298

Dear Mr. Koski:

The Wilderness Society would like to be included on the mailing list for the proposed land exchange and right-of-way for the proposed Mesquite Regional Landfill. Please notify this office of all meetings, documents and decisions related to this project.

This letter is in response to the scoping notice published in the Federal Register on May 8, 1992. At least one option considered by the joint Federal-County Environmental Impact Statement/Report (EIS/EIR) must be the use of the open pits for the landfill. By the time the proposed landfill would begin operation, the existing mining operation will be well through its expected operating life. The fact that the pits will contain residual mineralization is of minor significance. The potential environmental benefit of using the pits rather than undisturbed land is so significant that it must be considered as an alternative.

The phrase "specially designed impermeable liner" used in the Federal Register notice is misleading and inaccurate. According to experts in the construction and use of the type of liner described, all liners leak. Thus, the major question of concern is to what extent will the liner leak and can the impact of this leakage be mitigated? The EIS/EIR must also describe how the impact of this leakage will be mitigated and provide an analysis of the likelihood that it can be done successfully.

In its consideration of social and economic impacts, the EIS/EIR must compare the social and economic impact of turning the area into an industrial park as opposed to the values recreation, wildlife habitat, open-space, and tourism would provide for the region on a permanent basis. This analysis

900 SEVENTEENTH STREET, N.W., WASHINGTON, D.C. 20006-2596
(202) 833-2300

Printed on recycled paper

should include a consideration of the indirect costs of such a project. This would include costs of the degradation of water and air quality and the accompanying increase in health care costs attributable to the air and water pollution.

The EIS/EIR must make clear that the land exchange would result in the permanent reduction in wildlife habitat for such species as the desert tortoise.

The EIS/EIR must consider all the various potential cumulative impacts to plant, animal, recreational, aesthetic, and cultural resources from this project when put into the context of past, existing, and potential future activities on private, federal, and state lands in the region.

I can't say that I look forward to reviewing the EIS/EIR when it is released, but I would like to thank you in advance for sending it and all other documents and related materials to The Wilderness Society as they become available.

Sincerely,

Norbert Riedy
Senior Policy Analyst

IMPERIAL COUNTY FISH & GAME COMMISSION

ROBERT TRIMM, Chm.
VIC BENTON
LARRY CAFFEY

DAVID CROCKETT
CAROLYN HINDLE
SAMUAL KAKER

ELDON MOORE
STEPHEN REBIK
KENNETH VAN DE GRAFF
JOHN WHITLOCK

155 South 11th • Suite C
El Centro, CA 92243-2851
(619) 339 - 4385

MAY 27, 1991

2000
Mesquite
Landfill

MR. BEN KOSKI
Area Manager
U.S. Bureau of Land Management
El Centro Resource Area
333 South Waterman
El Centro, CA 92243

RE: Arid Operations Inc. - Proposed Mesquite Regional Landfill MSW

Dear Mr. Koski:

As a part of the preliminary environmental assessment and evaluation process, the Imperial County Fish & Game Commission wishes the following requests be considered for mitigation purposes under C.E.Q.A. & N.E.P.A. guidelines:

1) Implementation of guidelines established by California Department of Fish & Game, 1984 D-12 Burro Deer Herd Management Plan and 1990 Survey Report Update (ie requiring water source development at 6 mile intervals and other management objectives)

2) Participation in 3 year (1991-1993) Ecology Study of Desert Dwelling Bighorn Sheep in southeastern Imperial County.(Chocolate Mts. & black Mts. area N.& S of Hwy 78)

3) Participation in studies and evaluations of wildlife management and maintenance programs for various impacted local species, i.e. desert tortoise, spade-foot toad, summer/winter range migration of desert burro deer, etc.

For decades, agencies such as I.C. F&G Commission, CDFG, . BLM, DWU and USMC have developed and maintained numerous natural and artificial water sources for varied desert wildlife in eastern Imperial County. Continued human development requires additional efforts and expenditures to maintain and propagate wildlife resources with new challenges and costs to be shared among all benefactors.

Your consideration in this request is appreciated.

Respectfully
Randy Rister

Randy

blm-5-92
cd

WRITTEN STATEMENT

MESQUITE REGIONAL LANDFILL EIS/EIR

Submit to BLM representative at Scoping Meeting or mail to: Reference BLM-CA 29617 Area Manager, Bureau of Land Management, El Centro Resource Area, 333 South Waterman Avenue, El Centro, California, 92243-2298. Mailed statements should be postmarked no later than June 12, 1992.

See attached letter (1page) photos of water drinkers (6 pages)
Project location map w/water drinkers & wildlife areas (1page)

Imperial County Fish & Game Commissi

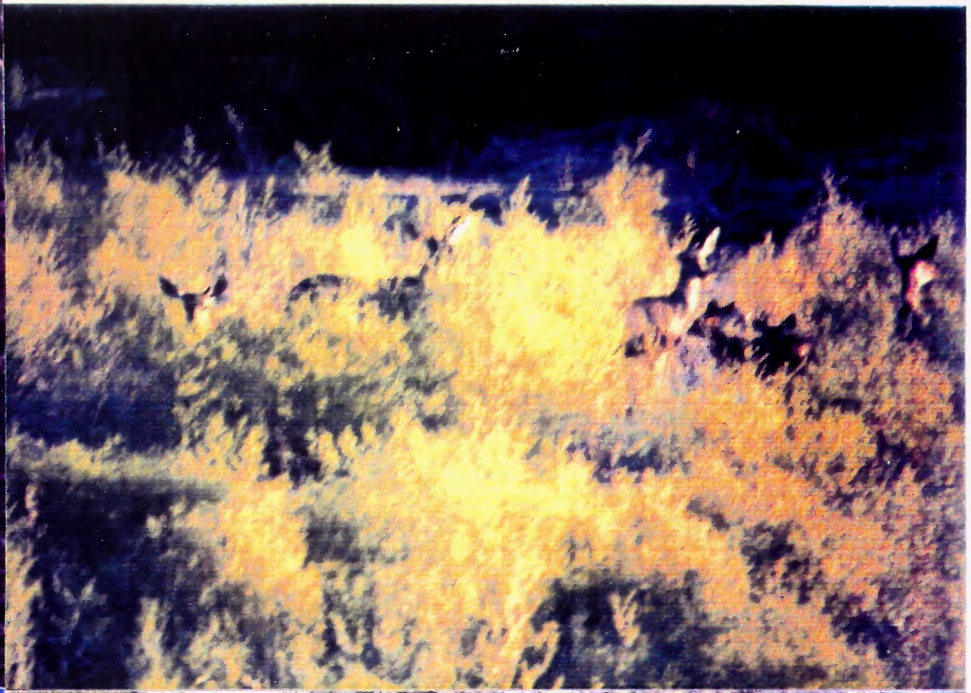
Submitted By: Randy J Rister
Name (please print)

1002 State St
Street Address

El Centro Calif 92243
City State Zip

Does in

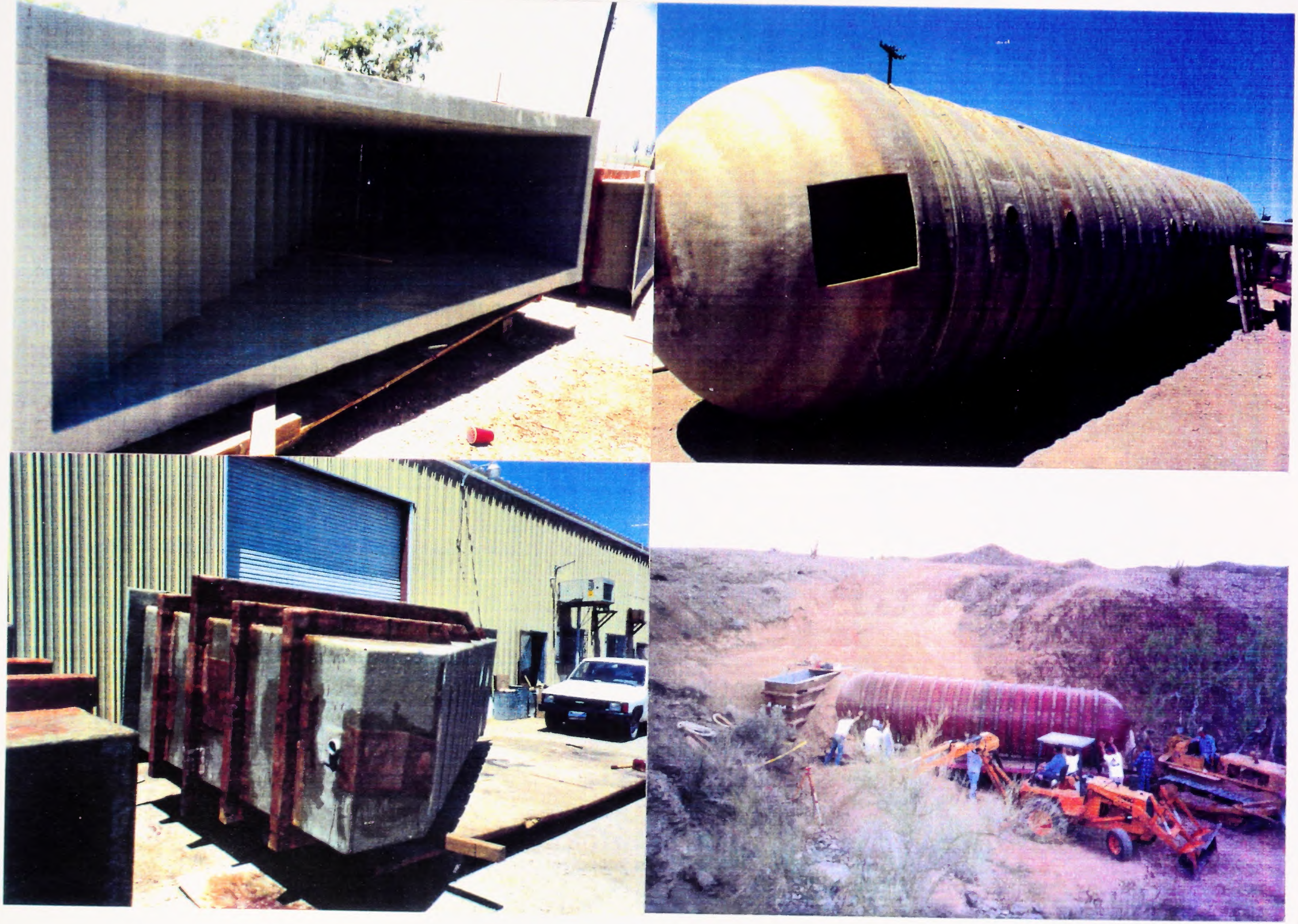
N. Algodones dunes



Wild Burro in foothill S. of Goldfields

Big horn Sheep (Nelson varity in Chocolates)

Fiberglas Rain collection drinkers 10,000 gal – 22000 gal



Peter Kane Sheep, Deer, and wildlife drink

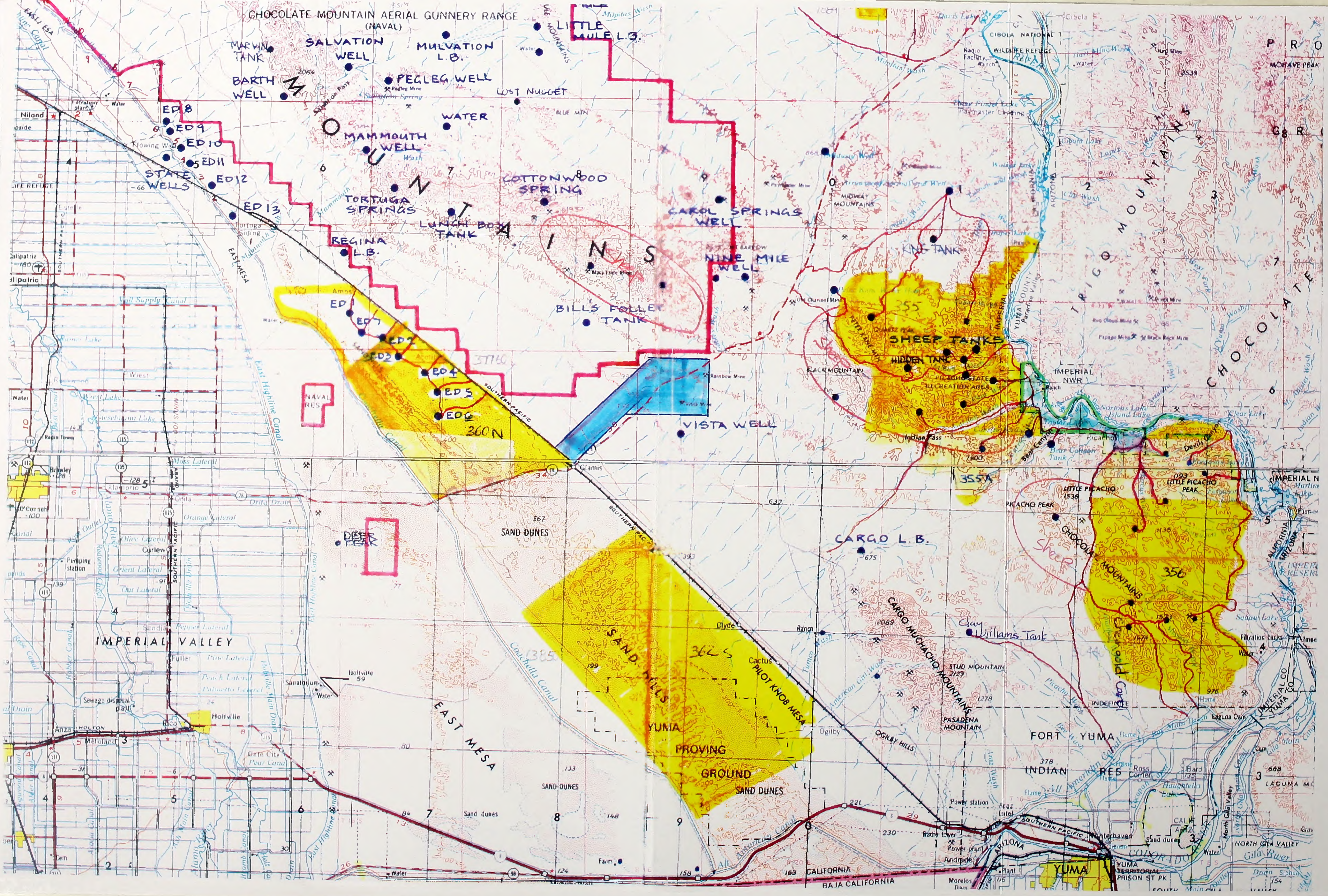
Mammoth Well

Closed Algodunes Dunes WSA 30

Natural Tanks

Bella Folley NE of Goldfields

Cargo Mucacho C.B.


CHOCOLATE MOUNTAIN AERIAL GUNNERY RANGE
(NAVAL)
MARVIN TANK
SALVATION WELL
MULVATION L.B.
LITTLE MULE L.G.
BARTH WELL
PEGLEG WELL
LOST NUGGET
WATER
MAMMOUTH WELL
ED 8
ED 9
ED 10
ED 11
STATE WELLS
ED 12
ED 13
MOUNTAINS
COTTONWOOD SPRING
TORTUGA SPRINGS
LUNCH BOX TANK
REGINA L.B.
CAROL SPRINGS WELL
NINE MILE WELL
BILLS FOLLEY TANK
ED 1
ED 7
ED 2
ED 2
ED 4
ED 5
ED 6
360 N
377 C
VISTA WELL
CIBOLA NATIONAL WILDLIFE REFUGE
KING TANK
355
SHEEP TANKS
HIDDEN TANK
PICACHO STATE RECREATION AREA
IMPERIAL NWR
Sheep
BLACK MOUNTAIN
MIDWAY MOUNTAINS
TRIGO MOUNTAINS
CHOCOLATE
355 A
LITTLE PICACHO PEAK
PICACHO PEAK
CHOCOLATE MOUNTAINS
356
Sheep
CARGO L.B.
CARGO MUCHACHO MOUNTAINS
Clay
Williams Tank
STUD MOUNTAIN
PASADENA MOUNTAIN
OGILBY HILLS
FORT YUMA INDIAN RES
Glamis
SAND DUNES
DEER PEAK
NAVAL RES
SAND HILLS
362 S
PILOT KNOB MESA
YUMA PROVING GROUND
SAND DUNES
EAST MESA
IMPERIAL VALLEY
Niland
Calipatria
Brawley
Holtville
SOUTHERN PACIFIC
Coachella Canal
CALIFORNIA
BAJA CALIFORNIA
ARIZONA
YUMA
YUMA TERRITORIAL PRISON ST PK
COLORADO
Gila River
NORTH GILA VALLEY
LAGUNA MOUNTAINS
IMPERIAL CO
YUMA CO
Laguna Dam
Winterhaven

SUMMARY OF EL CENTRO PUBLIC MEETING SCOPING ISSUES

Comment No.	Public Comment	Category	EIS/EIR Section/Remarks
1.	Address the risk of earthquakes in the area.	A	Soils/Geology
2.	Address the wildlife in the desert (impacts).	A	Biology
3.	What are the impacts on jobs, tax base, buying power, wages?	A	Socioeconomics
4.	Address environmental activities of the mine to date.	A	Throughout EIS/EIR (as appropriate)
5.	Utilize existing data for the site.	A	As Appropriate
6.	Work initiated by various agencies.	A,B	Biology - As Appropriate
7.	Opportunity to support research conducted on Big Horn Sheep.	B	Biology - If Appropriate
8.	Impacts on Burro Deer Herd (fawning practices).	A	Biology
9.	Impacts on access to natural/artificial water resources.	B	Water Resources - If Appropriate
10.	Impacts to wildlife resources.	A	Biology
11.	Blowing trash.	A	Project Description/Environmental Health & Public Safety
12.	Flash floods.	A	Water Resources
13.	Flora/fauna (loss of).	A	Biology
14.	Why here? Why not Los Angeles?	A	Purpose & Need/No Action Alternative/ Socioeconomics
15.	Why is Gold Field building here? (Economics).	A	Purpose & Need/No Action Alternative/ Socioeconomics
16.	Economic benefit to Imperial County.	A	Socioeconomics
17.	History of Western Waste.	C	Not a CEQA/NEPA Issue. The Board of Supervisors has directed background checks on the applicant and owners.
18.	Percentage of proposed workers from Imperial County - Socioeconomic Analysis.	A	Socioeconomics

Notes: A = Already Addressed B = New Scoping Issue C = Not to be included in the EIS/EIR

SUMMARY OF EL CENTRO PUBLIC MEETING SCOPING ISSUES

Comment No.	Public Comment	Category	EIS/EIR Section/Remarks
19.	Potential for leakage and impacts on the Salton Sea.	A	Water Resources
20.	Types of jobs that would be created broken down by wages/earnings.	A	Socioeconomics
21.	Tax impacts, benefit to local businesses.	A	Socioeconomics
22.	Assess the impact of the recent drought on groundwater table.	A	Water Resources
23.	Source of water to be used on-site. Treatment of water to be used on-site.	A	Water Resources
24.	Source of cover/liner. What is it, has it been treated, is it contaminated?	A	Water Resources/Environmental Health & Public Safety
25.	How will we know if project has worked as proposed.	A	As Appropriate, Regulatory Agency Review and Mitigation Monitoring
26.	Independent study of sub-basin.	A	Water Resources
27.	Effect of ground temperature on methane gas extraction.	A	Air Quality
28.	What tests will be done on the cover material (cyanide)?	A	Water Resources/Environmental Health & Public Safety
29.	Address recycling/resource recovery (on-site and at the loading docks).	A	Project Background/Alternatives
30.	Source reduction effects and global impacts.	A	Project Background/Alternatives/ Throughout EIS/EIR
31.	Who will be the watchdogs after landfill closes?	A	Project Description
32.	How much can be recycled?	A	Project Background/Alternatives
33.	Will any money be put aside for disasters?	A	Project Description
34.	Why here? Why Gold Field?	A	Purpose & Need/No Action Alternative/ Socioeconomics
35.	Attempts to recycle before trash is placed in sealed containers.	A	Project Background
36.	How will it be decided what materials are recyclable?	A	Project Background

Notes: A = Already Addressed   B = New Scoping Issue   C = Not to be included in the EIS/EIR

SUMMARY OF EL CENTRO PUBLIC MEETING SCOPING ISSUES

Comment No.	Public Comment	Category	EIS/EIR Section/Remarks
37.	What type of trash will be placed in the landfill.	A	Project Background/Project Description
38.	How will Imperial County take advantage of the proposed project for their own trash?	A	Project Description
39.	Economic impact on urban people, cost.	C	Project would not noticeably influence economic conditions in urban areas. Instead economic conditions in urban areas will determine volume of MSW delivered to the landfill.
40.	How did Gold Field acquire project land/mine?	A	Background
41.	What is projected income of project?	C	The socioeconomic impacts of the proposed landfill on Imperial County will be addressed in the Socioeconomic Section of the EIS/EIR. The projected income of the proposed project is not a CEQA/NEPA issue.
42.	What are the cumulative impacts?	A	Cumulative/As Appropriate
43.	Gold Field's past record.	C	Not a CEQA/NEPA Issue. The Board of Supervisors has directed background checks on the applicant and owners.
44.	Identify service area.	A	Project Description
45.	Identify the recreational use of the area and project's effect on recreational uses.	A	Recreational Resources
46.	How will landfill look upon completion (revegetation, etc.)?	A	Visual
47.	Effect on A.C.E.C. (blowing trash).	A	Project Description/Environmental Health & Public Safety
48.	How will hazardous waste be removed at the source?	A	Project Background

Notes: A = Already Addressed B = New Scoping Issue C = Not to be included in the EIS/EIR

SUMMARY OF EL CENTRO PUBLIC MEETING SCOPING ISSUES

Comment No.	Public Comment	Category	EIS/EIR Section/Remarks
49.	Monitoring system (extent, duration).	A	As Appropriate
50.	What third parties will review monitoring.	A	In various sections of the EIS/EIR, as appropriate
51.	Who has enforcement authority?	A	In various sections of the EIS/EIR, as appropriate
52.	What facilitates/causes partial closure?	A	Project Description/Environmental Health & Public Safety
53.	Potential for leachate, off-site groundwater monitoring wells.	A	Water Resources
54.	Effects of lightning strikes on landfill.	B	Environmental Health & Public Safety
55.	Mexican Agency contact, translation of EIS/EIR into Spanish.	C	There are no agreements between the U.S. and Mexico which apply to the siting and development of MSW landfills near the border. The comment may have been made in reference to the 1983 La Paz Agreement. This agreement only applies to hazardous waste landfills.
56.	Combustibility of landfill, detection, how fires will be extinguished.	A	Environmental Health & Public Safety
57.	Daily rainfall patterns, on-site rainfall monitoring.	A	Air Quality/Water Resources
58.	Provisions to prevent trash blowing.	A	Environmental Health & Public Safety/Project Description

Notes: A = Already Addressed B = New Scoping Issue C = Not to be included in the EIS/EIR

Mesquite Regional Landfill Project EIS/EIR
Indio Public Scoping Meeting
Desert Expo Center, Indio

May 28, 1992 7:00 p.m.

INDIO SCOPING MEETING
Key Points Made by Speakers

1. What type of chemicals used to extract ore?
2. How would you determine if cover material is non-toxic?
3. Identify population and impacts on population in area (Glamis).
4. Identify groundwater in area and potential for leachate.
5. Monitoring wells.
6. Study of alternative waste management techniques (non-siting alternatives).
7. Proposed mitigation for air quality.
8. Explore non-siting alternatives/source reduction.
9. How diesel pollution would be mitigated.
10. Study of Los Angeles County causing waste crisis.
11. What has led to proposal (background).
12. Impact of train traffic on the Coachella Valley.
13. Cumulative train impacts, safety impacts.
14. Mitigation of train related noise.
15. Cumulative impacts.
16. Why are dumps being closed out of Los Angeles?
17. Why here? (low income, low political areas that don't have money to fight back).
18. Start with base figures of this project and measure against projects already approved (cumulative impacts).
19. Identify approved projects and what this project will add.
20. Alternative transport route to avoid Coachella Valley.
21. Identify source of waste. Will it come from out-of-state?
22. Possibility of accidents/delays along routes.
23. How would project ensure waste delivered to correct site?
24. If water gets contaminated, how will liability for contamination be determined.
25. Address alternatives.
26. Long delay along route, effect of solid waste exposure to heat, risk of disaster (methane).
27. How to mitigate effect on property values.
28. Economic benefit to County/City.
29. Has any agreement been made with Government to help obtain permits?
30. Does county own a part of the landfill?
31. How does this project fit long range plan of Government to phase out landfills?
32. History of Western Waste obtaining insurance to protect citizens/ affected communities.
33. Who will be the insurer for landfill against environmental impacts?
34. How many landfills covered.
35. Studies of flood events, availability of studies.
36. Measures to be taken in case of emergency to neutralize toxics from landfill, Southern Pacific, landfill itself.
37. What are state of art regulations for California integrated waste management and will regulations be followed?

DESERT EXPO CENTER, INDIO (continued)

38. Describe MRF facilities/transfer stations (location description). Are they the same as Riverside County?
39. Do landfill liners leak? Are you depending on emergency backup system?
40. Is aquifer adjacent to landfill?
41. Economic ramification of med-fly being transferred from Los Angeles or from train accident.
42. Will containers be water tight/potential impacts.
43. Examine any conflict in Santa Rosa Land Exchange vis-a-vis BLM Mt. Conservancy.
44. Leachate collection system, why only single liner?
45. How will permeability of liners be improved?
46. How to remediate clogging of filter system?
47. What is liability of federal government for right-of-way?
48. Background check (environmental record) of all applicants (Western Waste) violation, litigation.
49. Ramification of derailment on Coachella Canal, how to prevent leaking into canal, liability for leaking.
50. Does recycling increase fluid generation?
51. How can an individual distinguish between the containers carrying waste for Eagle Mountain Landfill and the containers carrying waste for the proposed Mesquite Landfill?

If checked - send copy of BLM/Imp. Cty/Arid Land MOU

MEETING ROSTER
MESQUITE REGIONAL LANDFILL
EIS/EIR PUBLIC SCOPING MEETING

NAME	ORGANIZATION	ADDRESS	PHONE NUMBER	TELEFAX NUMBER	
DICK RAMIREZ	CHAMBERS DEVELOPMENT CO.	1850 LINCOLN SP 213 EL CENTRO, CA	(619) 352-2393	( ) -	
Donna Charpied	CITIZENS FOR THE CHUCKWALLA VALLEY	P.O. BOX 321 Desert Center, CA 92239	(619) 392 4722	( ) - SAME	✓
Loy Charpied	C.C.V.	P.O. Box 321 Desert Center Ca.	(619) 392-4722	( ) -	✓
Jurg Heuberger	Planning Dir.	940 main st., E.C. IC.	(619) 339 4236	(619) 353 8338	
Robt. Roman Jr.	EAGLE MT. LANDFILL OPPOSITION COALITION	P.O. BOX 2000 INDIO 92202	(619) 343 7977	~~( ) -~~	✓
Andrea Grona		72727 #2 Eagle Rd. P.D.	(619) 779-9472	( ) -	✓
JOHN BROMLEY	P.V. HomeOwners	76536 HOLLYHOCK, PALM DESERT	(619) 345 8874	( ) -	
Joey Muna Jr.	EMLOC.	52 280 CALLE CAMACHO COACHELLA 92236	(619) 398 5783	( ) -	✓
Phil Hampton	The Desert Sun	750 N Gene Autry Trail P.S. 92263	( ) 778-4644	( ) 778-4654	
JOSEPH SADACCA	HOMEOWNER AGAINST EAGLE MT. LANDFILL	76636 BEGONIA LN., PALM DESERT 92260	(619) 772-1044	( ) -	✓
JULIE SADACCA	"	"	( ) - "	( ) -	
Demi Dobrenty	Fit Environment	74-151 Peppergrass P.D.	(619) 341 0531	( ) -	✓
Ruth Woodard	FIT	72-849 Sierra Vista P.D.	(619) 341-0792	(619) 345 0206	✓
Tom Allen	Fit	44380 E Sundown Crest	619 345 7855	( ) -	
O.J. Anderson		P.O. Box 232 Desert Center 92239	(619) 227-3261	619 392-8101	
DAN ROMAN	EMLOC	P.O. BOX 2000, INDIO 92201	(619) 347-8997	( ) -	✓
			( ) -	( ) -	
			( ) -	( ) -	

MESQUITE REGIONAL LANDFILL EIS/EIR

PUBLIC SCOPING MEETING SPEAKER'S CARD

PLEASE FILL OUT AND SUBMIT THIS CARD TO A BLM REPRESENTATIVE IF YOU WISH TO SPEAK.

Your name will be called during the public comment period of the meeting.

(please print)

Name: Tom Allen

Street Address: 44 380 E Sundown Crest

City: La Quinta State: CA Zip: 92253

Representing: FIT

Issue(s) of Concern: efficacy questions

ADVISORY: Depending upon the number of persons wishing to comment, presentations may be limited to three minutes.

MESQUITE REGIONAL LANDFILL EIS/EIR

PUBLIC SCOPING MEETING SPEAKER'S CARD

PLEASE FILL OUT AND SUBMIT THIS CARD TO A BLM REPRESENTATIVE IF YOU WISH TO SPEAK.

Your name will be called during the public comment period of the meeting.

(please print)

Name: Denise Dobrensky

Street Address: 74-151 Peppergrass

City: Palm Desert State: CA Zip: 92260

Representing: Fit Enviornment

Issue(s) of Concern: Proper construction and Design

ADVISORY: Depending upon the number of persons wishing to comment, presentations may be limited to three minutes.

MESQUITE REGIONAL LANDFILL EIS/EIR

PUBLIC SCOPING MEETING SPEAKER'S CARD

PLEASE FILL OUT AND SUBMIT THIS CARD TO A BLM REPRESENTATIVE IF YOU WISH TO SPEAK.

Your name will be called during the public comment period of the meeting.

(please print)

Name: Donna Charpied

Street Address: PO BOX 321

City: Desert Center State: CA Zip: 92239

Representing: THE DESERT; CITIZENS FOR THE CHUCKWALLA VALLEY CCV

Issue(s) of Concern: AIR;/ WATER;/ ENDANGERED / THREATENED SPECIES / ALTERNATIVES TO DUMPS, I COULD GO ON AND ON AND ON.

ADVISORY: Depending upon the number of persons wishing to comment, presentations may be limited to three minutes.

MESQUITE REGIONAL LANDFILL EIS/EIR

PUBLIC SCOPING MEETING SPEAKER'S CARD

PLEASE FILL OUT AND SUBMIT THIS CARD TO A BLM REPRESENTATIVE IF YOU WISH TO SPEAK.

Your name will be called during the public comment period of the meeting.

(please print)

Name: Robt. E. Roman, Jr.

Street Address: P.O. BOX 2000

City: INDIO State: CA Zip: 92202

Representing: EAGLE MT. LANDFILL OPPOSITION COALITION. ASSISTANT CHAIRMAN

Issue(s) of Concern: AIR QUALITY IN COACHELLA VALLEY, HEALTH EFFECTS ON CITIZENRY.

ADVISORY: Depending upon the number of persons wishing to comment, presentations may be limited to three minutes.

MESQUITE REGIONAL LANDFILL EIS/EIR

PUBLIC SCOPING MEETING SPEAKER'S CARD

PLEASE FILL OUT AND SUBMIT THIS CARD TO A BLM REPRESENTATIVE IF YOU WISH TO SPEAK.

Your name will be called during the public comment period of the meeting.

(please print)

Name: DANIEL SCOTT ROMAN

Street Address: P.O. BOX 2000

City: INDIO State: CA Zip: 92202

Representing: EAGLE MT. LANDFILL OPPOSITION COALITION: CHAIRMAN.

Issue(s) of Concern: AIR QUALITY, LEGAL ISSUES.

ADVISORY: Depending upon the number of persons wishing to comment, presentations may be limited to three minutes.

MESQUITE REGIONAL LANDFILL EIS/EIR

PUBLIC SCOPING MEETING SPEAKER'S CARD

PLEASE FILL OUT AND SUBMIT THIS CARD TO A BLM REPRESENTATIVE IF YOU WISH TO SPEAK.

Your name will be called during the public comment period of the meeting.

(please print)

Name: JOHN BROMLEY

Street Address: 76536 HOLLYHOCK DR

City: PALM DESERT State: CA Zip: 92260

Representing:

Issue(s) of Concern: TRAINS / TRUCKS + SMOG ETC.

ADVISORY: Depending upon the number of persons wishing to comment, presentations may be limited to three minutes.

MESQUITE REGIONAL LANDFILL EIS/EIR

PUBLIC SCOPING MEETING SPEAKER'S CARD

PLEASE FILL OUT AND SUBMIT THIS CARD TO A BLM REPRESENTATIVE IF YOU WISH TO SPEAK.

Your name will be called during the public comment period of the meeting.

(please print)

Name: JOEY ACUÑA JR.

Street Address: 52-280 CALLE CAMACHO

City: COACHELLA State: CA. Zip: 92236

Representing: E.M.L.O.C.

Issue(s) of Concern: Targeting of these projects.

ADVISORY: Depending upon the number of persons wishing to comment, presentations may be limited to three minutes.

MESQUITE REGIONAL LANDFILL EIS/EIR

PUBLIC SCOPING MEETING SPEAKER'S CARD

PLEASE FILL OUT AND SUBMIT THIS CARD TO A BLM REPRESENTATIVE IF YOU WISH TO SPEAK.

Your name will be called during the public comment period of the meeting.

(please print)

Name: JOSEPH SADACCA

Street Address: 76636 BEGONIA LN.

City: PALM DESERT State: CA Zip: 92260

Representing: HOMEOWNERS AGAINST EAGLE MOUNTAIN LANDFILL

Issue(s) of Concern: AIR POLLUTION, NOISE, PROPERTY VALUES, GENERAL HEALTH

ADVISORY: Depending upon the number of persons wishing to comment, presentations may be limited to three minutes.

MESQUITE REGIONAL LANDFILL EIS/EIR

PUBLIC SCOPING MEETING SPEAKER'S CARD

PLEASE FILL OUT AND SUBMIT THIS CARD TO A BLM REPRESENTATIVE IF YOU WISH TO SPEAK.

Your name will be called during the public comment period of the meeting.

(please print)

Name: Larry Charpied

Street Address: 45-200 Kaiser Rd. / mailing P.O Box 321 Desert Center Ca. 92239

City: Desert Center State: Ca. Zip: 92239

Representing: Citizen for the Chuck Walla Valley

Issue(s) of Concern: Enviromental / Economic

ADVISORY: Depending upon the number of persons wishing to comment, presentations may be limited to three minutes.

2000 Mesquite Landfill

CONVERSATION RECORD

TIME 9:25

DATE 5/28/92

TYPE

☐ VISIT ☐ CONFERENCE ☑ TELEPHONE

☐ INCOMING

☐ OUTGOING

Location of Visit/Conference:

ROUTING	
NAME/SYMBOL	INT

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU: Edie Harmon

ORGANIZATION (Office, dept., bureau, etc.):

TELEPHONE NO: none

SUBJECT: "Town Mtg. last night on Ariel Landfill"

SUMMARY

Mrs. Harmon asked if she could get the full name & address of a speaker - Mr. Berryman. Gave her information from sign-in sheet.

She also asked that I pass on to Ben something she'd like to see addressed - Her written comments will follow by 6/

She would like to see Assembly Bill 3024, now in Senate, which requires a demographic study be done on any potentially hazardous site, be addresse

~~&~~ This bill would require a site demograph

ACTION REQUIRED

NAME OF PERSON DOCUMENTING CONVERSATION: Pat Weller

SIGNATURE

DATE 5/28/92

ACTION TAKEN

SIGNATURE

TITLE

DATE

50271-101 ☆ U.S. GPO: 1988—201-760/60282

CONVERSATION RECORD

OPTIONAL FORM 271 (12-76)
DEPARTMENT OF DEFENSE

Survey be performed.

Told Mrs. Harmon that I would let Ben know of our conversation & asked her to address her comments, questions to us in writing by the 6/12 deadline.

SUMMARY OF INDIO PUBLIC MEETING SCOPING ISSUES

Comment No.	Public Comment	Category	EIS/EIR Section/Remarks
1.	What type of chemicals used to extract ore?	A	Water Resources/Environmental Health & Public Safety
2.	How would you determine if cover material is non-toxic?	A	Water Resources/Environmental Health & Public Safety
3.	Identify population and impacts on population in area (Glamis).	A	Socioeconomics
4.	Identify groundwater in area and potential for leachate.	A	Water Resources
5.	Monitoring wells.	A	Water Resources
6.	Study of alternative waste management techniques (non-siting alternatives).	A	Alternatives
7.	Proposed mitigation for air quality.	A	Air Quality
8.	Explore non-siting alternatives/source reduction.	A	Alternatives
9.	How diesel pollution would be mitigated.	A	Air Quality
10.	Study of Los Angeles County causing waste crisis.	A	Purpose & Need
11.	What has led to proposal (background).	A	Purpose & Need
12.	Impact of train traffic on the Coachella Valley.	A	Transportation/Noise/Air Quality/ Environmental Health & Public Safety
13.	Cumulative train impacts, safety impacts.	A	Transportation/Environmental Health & Public Safety
14.	Mitigation of train related noise.	A	Noise
15.	Cumulative impacts.	A	Cumulative Impacts - In Appropriate Sections

Notes: A = Already Addressed B = New Scoping Issue C = Not to be included in the EIS/EIR

SUMMARY OF INDIO PUBLIC MEETING SCOPING ISSUES

Comment No.	Public Comment	Category	EIS/EIR Section/Remarks
16.	Why are dumps being closed out of Los Angeles?	A	Purpose & Need/ No Action Alternative
17.	Why here? (low income, low political areas that don't have money to fight back).	A	Findings/Record of Decision/ Throughout EIS/EIR as appropriate
18.	Start with base figures of this project and measure against projects already approved (cumulative impacts).	A	Cumulative Impacts
19.	Identify approved projects and what this project will add.	A	Cumulative Impacts
20.	Alternative transport route to avoid Coachella Valley.	A	Alternatives
21.	Identify source of waste. Will it come from out-of-state?	A	Project Description/Alternatives
22.	Possibility of accidents/delays along routes.	A	Transportation/Environmental Health & Public Safety
23.	How would project ensure waste delivered to correct site?	B	Project Description
24.	If water gets contaminated, how will liability for contamination be determined.	A	Water Resources
25.	Address alternatives.	A	Alternatives
26.	Long delay along route, effect of solid waste exposure to heat, risk of disaster (methane).	A	Transportation/Environmental Health & Public Safety
27.	How to mitigate effect on property values.	B	Socioeconomics
28.	Economic benefit to County/City.	A	Socioeconomics

Notes: A = Already Addressed B = New Scoping Issue C = Not to be included in the EIS/EIR

SUMMARY OF INDIO PUBLIC MEETING SCOPING ISSUES

Comment No.	Public Comment	Category	EIS/EIR Section/Remarks
29.	Has any agreement been made with Government to help obtain permits?	C	A Memorandum of Understanding (MOU) among the Bureau of Land Management, the County of Imperial, and Arid Operations, Inc., was executed in April 1992. This MOU provides procedures and guidance on coordination and cooperation among the parties of the MOU for the preparation of a joint EIS/EIR. This MOU does not constitute an agreement to assist the applicant in obtaining permits. A copy of the MOU is included in Appendix A1 of the EIS/EIR.
30.	Does county own a part of the landfill?	C	No. There are no plans for the County of Imperial to own part of the landfill.
31.	How does this project fit long range plan of Government to phase out landfills?	A	Alternatives
32.	History of Western Waste obtaining insurance to protect citizens/ affected communities.	C	Not a CEQA/NEPA Issue. The Board of Supervisors has directed background checks on the applicant and owners.
33.	Who will be the insurer for landfill against environmental impacts?	A	Project Description
34.	How many landfills covered.	A	Project Description
35.	Studies of flood events, availability of studies.	A	Water Resources

Notes: A = Already Addressed B = New Scoping Issue C = Not to be included in the EIS/EIR

SUMMARY OF INDIO PUBLIC MEETING SCOPING ISSUES

Comment No.	Public Comment	Category	EIS/EIR Section/Remarks
36.	Measures to be taken in case of emergency to neutralize toxics from landfill, Southern Pacific, landfill itself.	A	Project Description/Air Quality/ Water Resources/Environmental Health & Public Safety/Transportation
37.	What are state of art regulations for California Integrated Waste Management and will regulations be followed?	A	Project Description/As appropriate in Mitigation Sections
38.	Describe MRF facilities/transfer stations (location description). Are they the same as Riverside County?	A	Project Background - Brief discussion of origin of MSW and independence from specific transfer station locations.
39.	Do landfill liners leak? Are you depending on emergency backup system?	A	Water Resources
40.	Is aquifer adjacent to landfill?	A	Water Resources
41.	Economic ramification of med-fly being transferred from Los Angeles or from train accident.	B	Environmental Health & Public Safety/ Socioeconomics
42.	Will containers be water tight/potential impacts.	A	Project Description/Environmental Health & Public Safety
43.	Examine any conflict in Santa Rosa Land Exchange vis-a-vis BLM Mt. Conservancy.	B	Land Use
44.	Leachate collection system, why only single liner?	A	Project Description/Water Resources
45.	How will permeability of liners be improved?	A	Project Description/Water Resources
46.	How to remediate clogging of filter system?	A	Water Resources

Notes: A = Already Addressed B = New Scoping Issue C = Not to be included in the EIS/EIR

SUMMARY OF INDIO PUBLIC MEETING SCOPING ISSUES

Comment No.	Public Comment	Category	EIS/EIR Section/Remarks
47.	What is liability of federal government for right-of-way?	C	Federal Government not liable for act of granting right-of-way
48.	Background check (environmental record) of all applicants (Western Waste) violation, litigation.	C	Not a CEQA/NEPA Issue. The Board of Supervisors has directed background checks on the applicant and owners.
49.	Ramification of derailment on Coachella Canal, how to prevent leaking into canal, liability for leaking.	A	Transportation/Environmental Health & Public Safety
50.	Does recycling increase fluid generation? (leachate)	A	Water Resources
51.	How can an individual distinguish between the containers carrying waste for Eagle Mountain Landfill and the containers carrying waste for the proposed Mesquite Landfill?	B	Project Description

Notes: A = Already Addressed B = New Scoping Issue C = Not to be included in the EIS/EIR

MEMORANDUM OF UNDERSTANDING

Among

U.S. Department of Interior - Bureau of Land Management
County of Imperial
Arid Operations, Inc.

April 1992

MEMORANDUM OF UNDERSTANDING

Among:
U.S. Department of the Interior - Bureau of Land Management
County of Imperial
Arid Operations Inc.

Concerning:

A. Proposal of Arid Operations Inc. to process a Conditional Use Permit application, Proposal for Exchange of Land, Right-of-Way application, Change of Zone application, and Comprehensive General Plan Amendment to utilize Gold Fields Mining Co.'s Mesquite Mine property in Imperial County and an associated railroad spur through public lands for a Class III waste disposal facility, the repair and maintenance of railroad equipment, facilities, and rail cars used to transport waste to the site, landfill gas recovery and utilization, composting, and leachate processing.

B. Proposal will involve evaluation of two possible project area configurations, referred to as Projects "A" and "B", to carry out the above activities. Project "A" is smaller than Project "B" and is entirely contained within the Project "B" boundaries.

C. Proposal will involve two distinct BLM actions: the granting of approximately 4 to 5 miles of right-of-way on public lands for a railroad spur to provide access to the site; and a land exchange involving approximately 90 or 1,750 acres of public lands to consolidate ownership of land within the Project "A" and "B" boundaries, respectively.

I. **Introduction and Purpose**: The proposed project is subject to Federal, State and local environmental laws requiring the preparation of an Environmental Impact Report and Environmental Impact Statement.

This Memorandum of Understanding (MOU) provides procedures and guidance on coordination and cooperation among the Bureau of Land Management (BLM), County of Imperial (Planning Department), and Arid Operations Inc. (AOI) for: (1) preparation of a legally sufficient joint Environmental Impact Report/Environmental Impact Statement (EIR/S); (2) processing project-related rights-of-way; and (3) processing project-related land exchanges. It is the intent of all Parties to this MOU that the preparation of the EIR/S will integrate Federal, State and County environmental processes, including scoping meeting, hearings and other public participation activities to the extent possible.

II. **Authorities**:

A. The Federal Land Policy and Management Act of 1976 (FLPMA), 43 U.S.C. 1701 *et seq*, and all subsequent regulations implementing this law.

B. The National Environmental Policy Act of 1969 (NEPA), 42 U.S.C., 4371 *et seq*, and all subsequent regulations implementing this law.

C. The California Environmental Quality Act of 1970 (CEQA), Public Resources Code, Section 21000 *et seq*, and all subsequent regulations implementing this law.

D. The Imperial County Rules to Implement CEQA.

III. **Procedures**: Within ninety (90) days of the execution of this MOU:

A. The Parties will jointly develop an EIR/S preparation plan which will describe the organization, scheduling, tentative schedule of coordination meetings, and will include a detailed statement of the scope of work.

B. AOI and BLM will jointly develop a preliminary work plan for processing the right-of-way application; and,

C. AOI and BLM will jointly develop an exchange agreement for processing the land exchange proposal.

The Parties have established primary persons to contact for all matters relating to preparation of this EIR/S. The designated individuals are:

G. Ben Koski:	BLM, El Centro Resource Area
Jurg Heuberger:	Imperial County Planning Department
Robert T. Filler:	AOI

Each participating Party may mutually and freely consult and will keep other concerned organizations informed regarding progress on the EIR/S, including additional data needs, scope of applicable activities and all issues of importance. Regularly scheduled and ad hoc coordination meetings will be held between the previously identified primary contact persons, state agencies and others, as appropriate, in order to ensure communication and coordination among all participating organizations. The Parties agree that in the event they are not in agreement regarding any major issue encountered during development of the EIR/S, the Parties hereto will work diligently to resolve such disagreement, keeping in mind the objective of one adequate, timely and economical EIR/S.

IV. **BLM Responsibilities**:

A. BLM will be the lead Federal agency in the EIR/S preparation and will be solely responsible for ensuring full compliance with the requirement of FLPMA, NEPA and other pertinent Federal laws and regulations.

B. BLM California Desert District Manager will have management lead on behalf of all Federal agencies.

C. BLM California State Director will be ultimately responsible for the scope, content and adequacy of those portions of the EIR/S relating to Federal agency requirements or regulations.

D. BLM, in consultation with County, will approve the selection of a qualified EIR/S Preparation Contractor by AOI.

E. BLM will provide AOI within thirty (30) days of execution of this MOU, a written estimate of the total costs to be incurred by the BLM for work associated with this MOU. BLM will provide AOI with a quarterly estimate of costs, to be paid in advance by AOI. Upon request and in compliance with Section VI, Paragraph G of this MOU, BLM will provide or cause to be provided to AOI a statement of charges for each employee showing labor hours, labor costs and expenses for the subject project. If the advance payment for a quarter exceeds the actual cost of the work performed during that quarter, the overpayment shall be credited to AOI in the next billing after the BLM has determined the amount of the overpayment. If the advance payment for a quarter is less than the actual cost of the work performed during that quarter, the amount of the difference shall be included in the amount due in the next billing after the BLM has determined the amount of underpayment.

F. BLM will review and approve all data, environmental descriptions, and analyses required of the EIR/S Preparation Contractor and other sources, and will not duplicate work that is already done and applicable to the site unless BLM determines that the work is unacceptable for purposes of complying with the NEPA. BLM will consult with County and AOI prior to determining whether existing work must be modified or redone. Where possible, supplemental work will be required as opposed to redoing existing studies.

G. BLM, in consultation with County, will formally accept the EIR/S from the EIR/S Preparation Contractor, after proper review and verification of the data and analysis. Written confirmation of this acceptance will be sent to AOI. BLM will prepare the Record of Decision (ROD).

H. BLM, in consultation with the County, will select an EIR/S Review Consultant whose responsibility will be to assist the County and BLM in such areas where their staffs do not have expertise and/or personnel availability. It is anticipated that these areas will include:

- Landfill design, construction and operation.
- Ground water and surface water protection and controls.
- Landfill gas control.
- Railroad operations.

V. County Responsibilities:

A. County will be the lead agency for ensuring full compliance with the requirements of CEQA.

B. The County of Imperial will be responsible for the scope, content and adequacy of those portions of the EIR/S relating to CEQA.

C. County will review data, environmental descriptions and analyses available from AOI and other sources and will not duplicate work that is already done and applicable to the site unless it is established that the work is unacceptable for purpose of complying with the CEQA. County will consult with AOI and BLM prior to determining whether existing work must be modified or redone. Where possible, supplemental work will be required as opposed to redoing existing studies.

D. County, in consultation with BLM, will approve the selection of a qualified EIR/S Preparation Contractor by AOI.

E. County, in consultation with the BLM, will formally accept the EIR/S from the EIR/S Preparation Contractor, after proper review and verification of the data and analysis. Written confirmation of this acceptance will be sent to AOI.

F. County, in consultation with the BLM, will select an EIR/S Review Consultant whose responsibility will be to assist the BLM and County in such areas where their staffs do not have expertise and/or personnel availability. It is anticipated that these areas will include:

- Landfill design, construction and operation.
- Ground water and surface water protection and controls.
- Landfill gas control.
- Railroad operations.

VI. AOI Responsibilities:

A. AOI will contract with the EIR/S Preparation Contractor it has selected after approval by BLM and County. The EIR/S Preparation Contractor shall execute a disclosure statement specifying that they have no financial or other interest in the outcome of the project. After the EIR/S Preparation Contractor has been employed by AOI, the contractor will be responsive to the BLM and the County with regard to NEPA and CEQA requirements. AOI will coordinate with this contractor to assure completion of an adequate, timely, and economical EIR/S.

B. AOI will provide BLM and County with any technical and environmental information AOI has which may be useful during EIR/S preparation.

C. Joint public meetings will be conducted by BLM and County. AOI may attend, or be represented.

D. AOI will pay all costs to prepare the EIR/S and any supporting document(s), including preparation, printing and distribution of the EIR/S.

E. AOI will respond to data requests and will provide review comments within a reasonable period of time.

F. AOI may attend, or be represented, at all meetings with Federal, State, regional and local agencies and concerned environmental groups as determined appropriate by BLM and County (e.g., discussions relating to the proposed action, threatened and endangered species, cultural resource compliance requirements, etc.). BLM and County shall provide adequate notice of all such meetings.

G. AOI will reimburse the BLM for actual costs reasonably incurred by the BLM to perform work required by this MOU. AOI will provide an advance payment of $35,000 from which BLM employees will be reimbursed for labor costs and other expenses acquired for work done in connection with the preparation of the EIR/S. This would include such things as notices, coordination meetings and hearings. If AOI decides to dispute any item of a BLM quarterly statement, AOI shall so notify the BLM within fifteen (15) days of receipt. If the dispute involves only the amount owed the United States, but not the need for the work to be done, AOI shall not withhold payment of the disputed amount, but shall pay it under protest. If the dispute pertains to the need for, or relevance of the work, or proposed work to be undertaken by the BLM, such work shall not be initiated until the dispute is resolved. AOI shall have the right to conduct at its own expense, reasonable audits by auditors or accountants, designated by AOI, of the books, records and documents of the BLM and of its independent consultants and/or contractors relating to the items on any particular statement that shall be submitted, at the place where such books, records and documents are usually maintained, at reasonable times. Provided, however, that written notice of a desire to conduct such an audit must be given the BLM: (a) at least fifteen (15) days prior to such audit; and (b) by no later than the seventy-fifth (75th) day after the close of the fiscal year for which the books, records and documents are sought to be audited, and provided further, that any such audits shall be completed within ninety (90) days after receipt by AOI of the statement containing the items to be audited.

H. AOI shall reimburse the county for actual costs reasonably incurred by the county to perform work required by this MOU. The county will bill AOI on a monthly basis for actual costs incurred. This shall include all billing for any county department authorized to collect fees as part of its review of relevant portions of the EIR/S. Such billing shall not be applicable to a department that is processing a concurrent permit application for which separate fees are the compensation. If AOI decides to dispute any item of a county monthly statement, AOI shall so notify the county within fifteen (15) days of receipt. If the dispute involves only the amount owed the county, but not the need for the work to be done, AOI shall not withhold payment of the disputed amount but shall pay it under protest. If the dispute pertains to the need for, or relevance of the work, or proposed work to be undertaken by the county, such work shall not be initiated until the dispute is resolved. AOI shall have the right to conduct at its own expense, reasonable audits by auditors or accountants, designated by AOI, of the books, records and documents of the county and of its independent consultants and/or contractors relating to the items on any particular statement that shall be submitted, at the place where such books, records and documents are usually maintained, at reasonable times. Provided, however, that written notice of a desire to conduct such an audit must be given the county: (a) at least fifteen (15) days prior to such audit; and (b) by no later than the seventy-fifth (75th) day after the close of the fiscal year for which the books, records and documents are sought to be audited, and provided further, that any such audits shall be completed within ninety (90) days after receipt by AOI of the statement containing the items to be audited.

I. AOI will cooperate with BLM in developing an exchange agreement for processing the land exchange and in submitting an SF 299 application for a right-of-way grant.

J. AOI agrees to pay any and all costs associated with the exchange as provided in the exchange agreement.

K. AOI will cooperate with BLM in providing any data or information necessary to the preparation of the EIR/S, or processing rights-of-way or land exchanges.

L. AOI will contract with the EIR/S Review Consultant discussed in Items IV.H and V.F.

VII. General Responsibilities:

A. BLM and County will invite AOI to attend meetings with Federal, State, regional and local agencies and other groups as appropriate.

B. BLM and County will consult with AOI during impact analysis and mitigation planning.

C. Parties will concurrently review all materials provided by the EIR/S Preparation Contractor and Review Consultant.

D. EIR/S materials provided to the BLM and County will be made available to the public only after formal submittal of the administrative draft EIR/S to the BLM and County, unless agreed upon by all parties.

E. All information and data collected or prepared for the EIR/S will be property of BLM and County.

VIII. Termination:

Each Party to this MOU may terminate their participation in this agreement after thirty (30) days' prior written notice to the other Parties. This EIR/S, including any supporting data and information, shall be submitted to BLM and County upon the termination of this MOU. If the termination is the result of dissension, during the intervening thirty (30) days, the Parties hereto agree to actively attempt to resolve any outstanding disputes or disagreements.

For the Bureau of Land Management, California Desert District

By: ______________________ Date: 4/27/92

Gerald E. Hillier, District Manager

For the County of Imperial

By: ______________________ Date: 4-12-92

Jurg Heuberger, Planning Director

For Arid Operations Inc.

By: Robert T. Filler Date: 4/10/92

Robert T. Filler, General Manager

MESQUITE REGIONAL LANDFILL EIS/EIR

APPENDIX A-2

NOTICE OF PREPARATION NOTICE OF INTENT AND RESPONSES

MAY - JULY, 1992

1.0 INTRODUCTION

The County of Imperial and the Bureau of Land Management (BLM) provided for a number of opportunities for early consultation and public comments on the environmental issues that should be addressed in the Environmental Impact Statement/Environmental Impact Report (EIS/EIR). These opportunities included public and agency "scoping meetings" in May of 1992, circulation of a Notice of Preparation (NOP) in May 1992, and publication of a Notice of Intent (NOI) in May 1992. The results of these activities are presented in Appendix A-2 of this EIS/EIR and are briefly summarized as follows:

1. The County of Imperial mailed an NOP to approximately 65 individuals and agencies on May 4, 1992. The NOP was distributed to known interested individuals and organizations as a notice of early consultation, as well as to known responsible agencies (State CEQA Guidelines Section 15082). Although the State CEQA Guidelines establish a 30-day comment period for the NOP, responses were received and considered through the month of July, 1992. A total of 14 letters were received in response to the NOP. A copy of the NOP, mailing list and responses is contained in this document.

2. The U.S. Department of Interior and the BLM published an NOI to prepare a joint Federal-State EIR/EIS in the Federal Register on May 8, 1992 (40 CFR Part 1508.22). A total of 14 letters were received in response to the NOI. A copy of the NOI, mailing list and responses is contained in this document. A copy of the NOI is contained in this document.

This scoping document summarizes the written correspondence received in response to the NOP and NOI. This document contains the following material:

- Copy of the NOP.

- Copies of written comments and correspondence received in response to the NOP.

- Copy of the NOI.

- Copies of written comments and correspondence received in response to the NOI.

- Summary tables of the individual comments received in response to the NOP and NOI. The individual comments were categorized as follows: A = Already Addressed; B = New Scoping Issue; C = Not to be included in the EIS/EIR; N/A = Not Applicable;or TBP = To be Provided. Finally, the summary tables identify where in the EIS/EIR the issue is addressed.

NOTICE OF PREPARATION AND RESPONSES

MAY - JULY, 1992

Notice of Preparation

To: State Clearinghouse
(Agency)
1400 Tenth Street
(Address)
Sacramento, CA 95814

Subject: Notice of Preparation of a Draft Environmental Impact Report

Lead Agency:

Agency Name Imperial County Planning Dept.
Street Address 939 Main Street
City/State/Zip El Centro, CA 92243
Contact Jurg Heuberger

Consulting Firm (If applicable):

Firm Name Butler Roach Group
Street Address 1660 N. Hotel Cirle Dr., Ste. 606
City/State/Zip San Diego, CA 92108
Contact Christina Anderson

Imperial County will be the Lead Agency and will prepare an environmental impact report for the project identified below. We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the EIR prepared by our agency when considering your permit or other approval for the project.

The project description, location, and the potential environmental effects are contained in the attached materials. A copy of the Initial Study (☐ is ☒ is not) attached.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date but *not later than 30 days* after receipt of this notice.

Please send your response to Imperial County Planning Department at the address shown above. We will need the name for a contact person in your agency.

Project Title: Mesquite Regional Landfill

Project Location: Glamis Imperial
City (nearest) County

Project Description: (brief) The construction and operation of a Class III municipal solid waste
ISW) landfill to be located primarily on-site of the currently operated Mesquite Gold Mine.
pproximately 600 million tons of Class III from various locations in Southern California would
e transported over existing rail systems and deposited at the landfill over a 100 year period.
lso proposed is a four to five mile railroad spur extension from the main rail line (near Glami
o the landfill. For detailed Project Desription, see attached.

Date 5-4-92

Signature

Title Jurg Heuberger, Planning Director

Telephone (619) 339-4236

Reference: California Administrative Code, Title 14, (CEQA Guidelines) Sections 15082(a), 15103, 15375. *Revised October 1989*

Notice of Completion

Appendix F

See NOTE below

SCH # ____________

Mail to: State Clearinghouse, 1400 Tenth Street, Sacramento, CA 95814 916/445-0613

Project Title: Mesquite Regional Landfill

Lead Agency: Imperial County Planning/Building Dept.

Contact Person: Jurg Heuberger

Street Address: 939 Main Street

Phone: (619) 339-4236

City: El Centro

Zip: 92243

County: Imperial

Project Location

County: Imperial

City/Nearest Community: Glamis

Cross Streets: State Hwy. 78 & County Road S34

Total Acres: 2580 or 4310

Assessor's Parcel No. 739-330-01-01

Section: 7,8,15 to 21 Twp. 13 S Range: 19 E Base: SBM

Within 2 Miles: State Hwy #: 78

Waterways: N/A

Airports: N/A

Railways: So. Pacific

Schools: N/A

Document Type

CEQA:
- ☒ NOP
- ☐ Early Cons
- ☐ Neg Dec
- ☐ Draft EIR
- ☐ Supplement/Subsequent
- ☐ EIR (Prior SCH No.) ____________
- ☐ Other ____________

NEPA:
- ☐ NOI
- ☐ EA
- ☐ Draft EIS
- ☐ FONSI

Other:
- ☒ Joint Document
- ☐ Final Document
- ☐ Other ____________

Local Action Type

- ☐ General Plan Update
- ☒ General Plan Amendment
- ☐ General Plan Element
- ☐ Community Plan
- ☐ Specific Plan
- ☐ Master Plan
- ☐ Planned Unit Development
- ☐ Site Plan
- ☒ Rezone
- ☐ Prezone
- ☒ Use Permit
- ☐ Land Division (Subdivision, Parcel Map, Tract Map, etc.)
- ☐ Annexation
- ☐ Redevelopment
- ☐ Coastal Permit
- ☐ Other ____________

Development Type

- ☐ Residential: *Units* ______ *Acres* ______
- ☐ Office: *Sq.ft.* ______ *Acres* ______ *Employees* ______
- ☐ Commercial: *Sq.ft.* ______ *Acres* ______ *Employees* ______
- ☐ Industrial: *Sq.ft.* ______ *Acres* ______ *Employees* ______
- ☐ Educational ____________
- ☐ Recreational ____________
- ☐ Water Facilities: *Type* ____________ *MGD* ______
- ☐ Transportation: *Type* ____________
- ☐ Mining: *Mineral* ____________
- ☐ Power: *Type* ____________ *Watts* ______
- ☐ Waste Treatment: *Type* ____________
- ☐ Hazardous Waste: *Type* ____________
- ☒ Other: Regional Municipal Solid Waste Landfill

Project Issues Discussed in Document

- ☒ Aesthetic/Visual
- ☐ Agricultural Land
- ☒ Air Quality
- ☒ Archeological/Historical
- ☐ Coastal Zone
- ☒ Drainage/Absorption
- ☒ Economic/Jobs
- ☒ Fiscal
- ☒ Flood Plain/Flooding
- ☐ Forest Land/Fire Hazard
- ☒ Geologic/Seismic
- ☒ Minerals
- ☒ Noise
- ☒ Population/Housing Balance
- ☒ Public Services/Facilities
- ☒ Recreation/Parks
- ☒ Schools/Universities
- ☐ Septic Systems
- ☐ Sewer Capacity
- ☒ Soil Erosion/Compaction/Grading
- ☒ Solid Waste
- ☒ Toxic/Hazardous
- ☒ Traffic/Circulation
- ☒ Vegetation
- ☒ Water Quality
- ☒ Water Supply/Groundwater
- ☐ Wetland/Riparian
- ☒ Wildlife
- ☒ Growth Inducing
- ☒ Landuse
- ☒ Cumulative Effects
- ☐ Other ____________

Present Land Use/Zoning/General Plan Use

Open Space/"S"/Recreation

Project Description The construction and operation of a Class III municipal solid waste (MSW) landfill to be located primarily on-site of the currently operated Mesquite Gold Mine. Approximately 600 million tons of Class III from various locations in Southern California would be transported over existing rail systems and deposited at the landfill over a 100 year period. Also proposed is a four to five mile railroad spur extension from the main rail line (near Glamis) to the landfill. (For detailed project description (see attached).

NOTE: Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. from a Notice of Preparati or previous draft document) please fill it in.

Revised October 1

S = Document sent by lead agency
ί = Document sent by SCH
✓ = Suggested distribution

- ____ Resources Agency
- ____ Boating & Waterways
- ____ Coastal Commission
- ____ Coastal Conservancy
- X Colorado River Board
- X Conservation
- X Fish & Game
- ____ Forestry
- ____ Office of Historic Preservation
- ____ Parks & Recreation
- X Reclamation
- ____ S.F. Bay Conservation & Development Commission
- ____ Water Resources (DWR)

Business, Transportation & Housing

- ____ Aeronautics
- X California Highway Patrol
- X CALTRANS District # 11
- X Department of Transportation Planning (headquarters)
- ____ Housing & Community Development

____ Food & Agriculture

Health & Welfare

- X Health Services Division of Environmental Health Services

State & Consumer Services

- ____ General Services
- ____ OLA (Schools)

Environmental Affairs

- X Air Resources Board
- X APCD/AQMD
- X California Waste Management Board
- ____ SWRCB: Clean Water Grants
- ____ SWRCB: Delta Unit
- X SWRCB: Water Quality
- ____ SWRCB: Water Rights
- X Regional WQCB # 7 ( )

Youth & Adult Corrections

- ____ Corrections

Independent Commissions & Offices

- ____ Energy Commission
- ____ Native American Heritage Commission
- X Public Utilities Commission
- ____ Santa Monica Mountains Conservancy
- X State Lands Commission
- ____ Tahoe Regional Planning Agency

- X Other El Centro Naval Air Facility
- X Marine Corps Air Station - Yuma, AZ

Public Review Period (to be filled in by lead agency)

Starting Date May 4, 1992

Ending Date June 5, 1992

Signature

Date May 4, 1992

Lead Agency (Complete if applicable):

Consulting Firm: Butler Roach Group

Address: 1660 N. Hotel Circle Dr., Ste. 606

City/State/Zip: San Diego, CA 92108

Contact: Christina Anderson

Phone: (619) 298-7127

For SCH Use Only:

Date Received at SCH

Date Review Starts

Date to Agencies

Date to SCH

Clearance Date

Notes:

Applicant: Arid Operations, Inc.

Address: 6502 East Highway 78

City/State/Zip: Brawley, CA 92227-9306

Phone: (619) 352-6541

Revised October 1989

4.0 PROJECT DESCRIPTION

4.1 INTRODUCTION

4.1.1 GENERAL

The Mesquite Regional Landfill is proposed to be located in eastern Imperial County (Figure 1.1) primarily on the site of the existing Mesquite Mine (Figure 1.2). Its primary purpose would be to dispose of MSW delivered to the site by rail (rail haul) from Southern California communities. Direct benefits of the project to Imperial County would be the receipt of import fees for each tonnage of disposed waste, long-term employment for approximately 268 people, local taxes, and increased local business to support ongoing landfill operational requirements. The proposed facility would also be available to accept MSW from the county and/or local municipalities, if residents and local agencies decide to include the regional landfill as part of their MSW disposal plans. Only locally (Imperial County) derived MSW would be transported to the site by transfer trucks, if appropriate.

The Mesquite Regional Landfill project would be arranged in one of the following two configurations:

- Project "A" shown in Figure 1.4
- Project "B" shown in Figure 1.5

The 2,580-acre Project "A" configuration is almost entirely on land owned by Gold Fields, requiring a land exchange with BLM for only about 100 acres. The 4,322-acre Project "B" configuration would include additional areas obtained through a land exchange with the BLM. Approximate key statistics for the two project configurations are:

CONFIGURATION	PROJECT AREA (acres)	LANDFILL AREA (acres)	LANDFILL MSW DISPOSAL CAPACITY	ESTIMATED LANDFILL OPERATIONAL LIFE
Project "A"	2,580	1,970	500 million tons	85 years
Project "B"	4,322	2,290	600 million tons	100 years

The landfill operational life estimates are based on the following six-day-per-week disposal rates:

- 4,000 tons per day for Year 1
- 8,000 tons per day for Year 2
- 12,000 tons per day for Years 3 through 6
- 16,000 tons per day for Year 7
- 20,000 tons per day after Year 7

The actual rate of growth and operational life will depend upon market conditions for MSW in Southern California. Also, the disposal capacity estimates do not include the volume which will be occupied by daily, intermediate and final cover material. It is anticipated that the MSW-to-cover material ratio will be approximately 5:1.

4.1.2 MSW ORIGIN

The Mesquite Regional Landfill would be established to help provide MSW disposal options for communities throughout Southern California. MSW would be accepted from Southern California counties (e.g., Los Angeles, Orange, San Bernardino, Riverside), depending upon local availability of landfill disposal capacity, reductions in waste volumes due to increased recycling, and the future construction of MSW transfer stations in lieu of landfills. MSW from Imperial County would also be accepted, if desired by the local municipalities.

It is anticipated that initial MSW for the Mesquite Regional Landfill operations would originate in Los Angeles County. Sources would be associated with: (1) current plans of the Los Angeles Sanitation District to divert about 4,000 tons per day (tpd) of MSW from its landfill system to a regional landfill, beginning in 1994, and (2) Western Waste's extensive collection system within Los Angeles County. The estimated disposal growth discussed in Section 4.1.1 would occur as the result of landfill closures anticipated for the mid-1990s and the related construction of substitute transfer stations. It is anticipated that initial loading of enclosed MSW containers onto railcar(s) would occur at existing Southern Pacific Railroad intermodal facilities in Long Beach and/or the City of Industry, both in Los Angeles County. Future intermodals may be constructed along main railroad lines currently existing in other Southern California counties, as transfer stations are substituted for existing landfills.

For environmental analysis purposes, it is assumed that if the regional landfill is used for disposing of MSW from Imperial County, the material would be transported to the site using transfer trucks from transfer stations constructed to replace existing small landfills. At a maximum, it is anticipated that the volume of locally derived MSW disposed at the regional landfill would be on the order of 300 to 500 tpd. This would result in between 12 and 20 transfer truck trips to and from the landfill each day. (Also see Section 4.4.)

No recycling activities are planned for the Mesquite Regional Landfill site. Therefore, the operation will not affect the The California Integrated Waste Management Act of 1989, State Assembly Bill 939 (AB 939) requirements for any of the originating counties or municipalities. The landfill would be designed to contain MSW that has received varying degrees of recycling, however, to assure that requirements of each originating facility (e.g., transfer station) would be accommodated. Also, an alternative to be analyzed in the CEQA and NEPA processes would be for the operation to include provisions for the short-term storage of small volumes of recyclable materials which may be diverted at originating communities, but for which there is no market. As described in Section 4.7, this type of storage would only occur within undeveloped portions of the landfill footprint. A time limit on storage would be established, after which the material would be returned to the originating community or disposed in the landfill. This temporary storage potential will be analyzed in the environmental documentation.

4.1.3 PROJECT ELEMENTS

The following section (4.1.4) describes the relationship of the landfill project to the existing Mesquite Mine and the gravel borrowing operations which occur on the project site. The remaining sections then describe the main features of the regional landfill project from initial construction through landfill closure in the following sequence:

- Section 4.2 - Landfill-Related Railroad Facilities
- Section 4.3 - Landfill
- Section 4.4 - Landfill Access
- Section 4.5 - Administrative and Maintenance Facilities
- Section 4.6 - Surface Water Drainage Control
- Section 4.7 - Potential Ancillary Land Use Activities
- Section 4.8 - Water Supply, Sanitation and Utilities
- Section 4.9 - Construction and Operating Personnel and Equipment
- Section 4.10 - Facility Closure and Postclosure Activities

4.1.4 RELATIONSHIP TO EXISTING ACTIVITIES

4.1.4.1 Relationship to the Mesquite Mine

As currently permitted, key elements at the Mesquite Mine include the following items, illustrated in Figure 1.2:

- Four open pits, from which approximately 440 million tons of gold-bearing ore and barren rock will have been removed between the project startup in 1985 and anticipated closure within the next 10 to 15 years.
- Approximately 10 overburden piles planned for the disposal of an estimated 350 million tons (200 million cubic yards) of barren rock excavated from the pits. The piles are projected to extend to heights of about 280 feet.

- An electric power supply, constructed by Gold Fields and then dedicated to the Imperial Irrigation District (IID) including:
  - A 161/92 kV tap substation approximately six miles east of the Mesquite Mine, to obtain power from a previously existing 161 kV transmission line owned and operated by the U.S. Department of Energy (U.S. DOE).
  - An approximately six-mile-long, 92 kV transmission line from the tap substation to the Mesquite Mine.
  - A 92/13.2 kV substation located at the Mesquite Mine.
- Approximately 1,000 acres of lined heap leach pads where gold is recovered by percolating a dilute cyanide leaching solution through piles of ore which are rinsed with fresh water (neutralized to be inert and nonhazardous) after gold recovery is completed. The heap leach piles will extend to a height of about 200 feet.
- Lined ditches and ponds for collecting the gold-bearing leach solution.
- A variety of administration, maintenance and process structures.
- A mine access road from Highway 78.
- A water supply system consisting of three 2,500-gpm wells approximately three miles south of the mine, and a pipeline to onsite storage tanks near the solution ponds and process facilities.
- Chain link or barbed wire fences around all process areas.

Mining operations at Mesquite primarily consist of:

- Drilling and blasting of rock from the mine pits.
- Hauling of overburden materials from the pits to stockpiles.
- Hauling of ore from the pits to a crushing facility, storage pile or leach pad.

Mining activities are conducted on a 20-hour-per-day, 7-day-per-week schedule.

The mine pits would not be included within the proposed landfill project, and would not be used for the disposal of MSW. Instead, the pits would remain open after closure of the mine so that deeper and/or lower grade ore can be mined in the future, if appropriate, based on new extraction technologies and economics.

The landfill operations would be closely integrated with overburden disposal pile and ore residue pile reclamation activities at the Mesquite Mine. It is anticipated that all of the ore residue, and the majority of overburden material would be eliminated as they are used for daily, intermediate, and final landfill cover (see Sections 4.3.4 and 4.3.6). Claystone portions of the overburden removed and stockpiled from the Vista and Rainbow pits would be used to construct sections of the low permeability landfill liner.

Additional mining facilities which would be used for the landfill include portions of the access road, the water supply system, the power transmission line, and portions of the fencing. One or more of the mine's administration and maintenance structures may also be used to supplement certain landfill facilities. These facilities are discussed in Section 4.5.

When combined, the integrated mine reclamation and landfill operation activities would allow the Mesquite Mine property to be converted to a productive second use with substantial economic and aesthetic benefits to the area.

4.1.4.2 Gravel Borrow Operations

Figure 1.6 shows how a portion of the project area would overlap existing BLM gravel withdrawal areas. Portions of the gravel resources are committed to specified users (e.g., Caltrans) through long-term contracts or leases. Permits for gravel withdrawal from other portions of the withdrawal area are issued annually to municipal agencies and contractors.

The gravel resources in these areas do not occur as deep deposits which are removed by excavating a pit. Instead, the economically recoverable gravel occurs as thin lenses (generally less than 5 feet) of surfacial alluvium at discontinuous areas, above an underlying conglomerate rock (see Section 5.2.3). Figure 4.1 shows the results of a gravel survey conducted by Gold Fields for several of the sections near the west end of the proposed landfill project. That survey shows useful surfacial gravel occurring over about half of the project area.

To avoid the loss of this resource, pockets of surfacial gravel encountered during the rail spur or landfill facilities construction would either be:

- Used as aggregate for project construction.
- Stockpiled at convenient locations for future removal by others, with appropriate agreements with the BLM.

4.2 LANDFILL-RELATED RAILROAD FACILITIES

4.2.1 GENERAL

The regional landfill concept is based on transporting MSW from population centers in Southern California to the landfill by railroad, in specially designed, ISO certified, enclosed containers and/or railcars. Figure 4.2 illustrates a type of container presently used to haul approximately 25 tons of MSW. The MSW would be "transferred" from local collection trucks into the containers at transfer stations located in various MSW pickup service areas. It is anticipated that recyclable materials would be removed from much of the MSW prior to placement in the containers in accordance with the AB 939. Example ways in which recyclable material removal would be accomplished include:

- Special "curb" separation procedures.
- Material recovery facilities (MRFs) at some or all of the transfer stations.

The containers would be transported by truck from the transfer stations to one of several railroad container handling facilities (intermodals) also located near the population centers. Figure 4.3 illustrates the procedure most frequently used to transport containers. For this transport mode, the containers would be stacked two high on special articulated railroad cars. Each car is typically about 265 feet long and carries 10 containers. Unit container trains for transporting the MSW would consist of 16 to 20 cars. These trains would be 4,600 to 5,600 feet long, and transport 160 to 200 containers each.

Because of the growth of rail haul systems, improvements to the efficiency of the above example type of transport system are expected to occur within the next several years. For example, procedures to transfer several container loads into single, larger railcars are under development for application at locations where it would be beneficial to reduce the number of "unit containers" which must be handled at a landfill. It is anticipated that the rail transport system for the Mesquite Regional Landfill will be modified from time to time to assure usage of the appropriate evolving technology. In all cases, the containers and/or railcars used would be closed and sealed to the extent necessary to prevent the potential escape of wastes during transport or handling.

The main Southern Pacific rail line, which passes near the Glamis Beach Store (Figure 1.1), connects the Southern Pacific's West Coast, Southern and Midwestern rail systems. This main line is located about four miles from the proposed Mesquite Regional Landfill. The new rail facilities associated with the landfill are discussed in the following sections:

- Section 4.2.2 - Railroad Spur
- Section 4.2.3 - Rail Unloading Intermodal

4.2.2 RAILROAD SPUR

The new railroad spur, shown in Figures 1.4 and 1.5 for Projects "A" and "B," would connect the landfill site to the existing Southern Pacific main line about one mile northwest of the Glamis Beach Store. The spur would be located about 2,500 feet away from Highway 78 to avoid interference with campers near the highway during holiday weekends when the nearby Imperial Sand Dunes Recreational Area is heavily used. The spur alignment would be designed to run parallel to the natural drainage pattern of washes in this area to avoid the need to divert and control large runoff flows.

Figure 4.4 shows a cross section through the railroad spur. The width of the right-of-way (ROW) would be approximately 150 feet to provide for:

- An initial single track for moving four or five trains per day from the main line to the landfill.
- A second future track, which would be constructed if needed for temporary (e.g., minutes to hours) holding of trains to satisfy main line schedules or unloading requirements at the landfill intermodal (Section 4.2.3).
- Small drainage ditches and berms to direct storm runoff flows to a railroad underpass which would be constructed near the west end of the spur.
- Communications and/or power lines to allow train movements on the railroad spur to be monitored and regulated. The communications and/or power lines could be provided on overhead poles or buried, depending upon final design considerations.

A buried gas pipeline would be constructed in the ROW if an energy recovery system based on cleaning LFG to commercial-use methane quality is implemented (see Section 4.3.5). Based on discussions with Southern California Gas Company, it is anticipated that the methane would be transported in a new pipe along the Southern Pacific Railroad to an existing gas line near Niland. The potential to install a gas pipeline along the existing railroad will be analyzed in the CEQA and NEPA process. Approvals or a right-of-way for the pipeline would be obtained from BLM.

Grade crossings would be provided at the locations shown in Figures 1.4 and 1.5 to allow public vehicle and gravel truck access across the railroad spur. Appropriate signs would be provided at each grade crossing location. Fencing would not be constructed along the rail spur from Glamis to the site. An automatic gate would be provided across the rail spur at the landfill perimeter fence to prevent unauthorized access into the intermodal area.

4.2.3 RAIL UNLOADING INTERMODAL

The general alignment of the rail unloading intermodal for Projects "A" and "B" are also shown in Figures 1.4 and 1.5. An example of intermodal operations, when the landfill would be operating at 20,000 tpd, is illustrated in Figure 4.5. Key elements of the intermodal include:

- Three unloading tracks. These tracks will allow three trains to be located onsite at any given time.

- One "runaround" track used to move locomotives from one end of the intermodal to the other, around the parked trains.
- Asphalt or concrete pavement between and adjacent to the tracks for supporting cranes which unload and load containers or specially designed railcars, and trucks which haul the MSW to and from the landfill.

Examples of the cranes and container trucks are shown in Figures 4.6 and 4.7. Estimates of the numbers of equipment and operators are discussed in Section 4.9.

Crane crossover zones would be provided near both ends of the intermodal to allow the cranes to move between trains or to a maintenance area. During final design, down-ramps and underpasses may be provided at intermediate distances along the intermodal to allow trucks to begin the haul to the landfill without driving the entire length around a parked train. Individual components of the intermodal could be constructed in phases to suit the rate that MSW volumes increase.

The intermodal operations will be modified from time to time as new methods of MSW handling are developed. For example, portions of the MSW may be transported to the landfill operating face (Section 4.3.4) in large trucks or on enclosed conveyors. Both of these types of examples, which would require transferring of the MSW at the intermodal will be considered in the environmental analysis.

4.3 LANDFILL

4.3.1 GENERAL

Figures 1.4 and 1.5 illustrate the anticipated final configuration for the Project "A" and "B" landfills. In each case, the basic landfill configuration would be formed above the existing grade, as opposed to being placed in the existing mine pits or deep excavations made specifically for disposal purposes. This configuration would assure that a large separation above ground water is maintained, and would maximize the potential for integrating landfill operations and productive utilization of mine overburden and ore residue piles.

Initially, the only excavation which would occur would be that necessary to recover gravel resources and construct the specially designed liner and leachate collection system (Section 4.3.3). These initial excavations would extend up to approximately 10 feet below the natural grade. As the landfill develops, the excavations may be extended deeper, if required to suit topography or leachate collection, or to supplement the use of mining overburden and ore residue materials for the daily, intermediate, and final landfill cover materials (Section 4.3.4). The base of the landfill would not be located less than 100 feet above ground water (see Section 5.2.5).

The perspective view of the Project "A" landfill configuration in Figure 4.8 shows how the landfill height would vary between about 375 and 475 feet. This variation would enhance overall aesthetics. The artist's rendering of the Project "A" landfill in Figure 4.9 shows how the variable landfill shape would tend to blend into the background topography, reducing the "man-made" appearance of straight lines and corners on the top of the landfill. The landfill would be varied from 3:1 at the bottom, to 5:1 near the top, to better resemble the configuration of a hill.

The portion of landfill west of the existing mine access road (see Figures 1.4 and 1.5) would initially be developed while the Mesquite Mine is still operational. Later, the access road would be removed as the landfill is expanded toward the east. If access to the mine area is still required, it would be provided by constructing a new road around the west end of the landfill.

The Mesquite Regional Landfill would be developed using state-of-the-art engineering and operating practices approved by the following agencies:

- The Imperial County Department of Health (Lead Enforcement Agency [LEA])
- The Imperial County Air Pollution Control District (APCD)
- Colorado River Regional Water Quality Control Board (RWQCB)
- The California Integrated Waste Management Board (CIWMB)

Descriptions of anticipated landfill design and operation procedures are described in the following sections:

- Section 4.3.2 - MSW Characteristics
- Section 4.3.3 - Liner and Leachate Management System
- Section 4.3.4 - Landfill Cell Development
- Section 4.3.5 - LFG Control
- Section 4.3.6 - Landfill Closure

4.3.2 MSW CHARACTERISTICS

The Mesquite Regional Landfill would be designated exclusively as a California Class III (Title 23, §2533, California Code of Regulations) landfill, for MSW only. It is anticipated that recyclable material will have been removed from the MSW prior to transport to the landfill (see Section 4.2.1).

The MSW disposed at the landfill will include Class III municipal garbage and trash which do not contain wastes which must be managed as hazardous wastes, or wastes which contain soluble pollutants in concentrations which exceed applicable water quality objectives, or could cause degradation of waters of the state, as defined in §2523 of Title 23, California Code of Regulations.

Special procedures would be established to check that hazardous materials are not accidentally disposed. Controls to avoid significant volumes of hazardous materials would initially occur at the transfer stations prior to loading MSW into the containers. Additional spot checking of loads would occur as the containers are emptied at the landfill face. Any hazardous materials identified would be removed to a specially controlled holding area, characterized, and removed to an appropriate offsite disposal facility.

Very small quantities of household hazardous materials can occasionally be mixed in with the MSW. This household hazardous waste component of waste streams has been steadily decreasing over the last few years as:

- Public information and education, and special programs for collection and proper disposal of these materials are provided.
- Materials are increasingly being segregated at transfer stations and MRFs, with added opportunities for observing and removing suspect materials.

In addition, state and federal laws and regulations regarding landfill environmental control systems are designed with the expectation that small amounts of these household hazardous wastes can be present in MSW. Since the Mesquite Regional Landfill would be constructed in full compliance with state and federal laws and regulations, the small amount of household hazardous waste that could potentially enter the landfill would not pose a threat to public health or the environment.

4.3.3 LINER AND LEACHATE MANAGEMENT SYSTEM

Because of the arid conditions at the site, and the high amount of compaction of the waste, (Section 4.3.4), it is not anticipated that leachate will be generated at the Mesquite Regional Landfill. Also, because of the large separation above ground water and the LFG collection system to be provided, it is not anticipated that ground water quality would be threatened.

To be conservative and satisfy anticipated future regulations, the landfill would be designed and constructed to have a state-of-the-art, low permeability liner and leachate control system. The type of liner and leachate collection system which would be initially used is illustrated in Figure 4.10. This design configuration would be modified in the future, if appropriate to suit technology advances, site experiences and/or changed regulations.

The clay portion of the composite liner shown in Figure 4.10 would be obtained from clayey overburden currently being removed from the Vista Mine Pit (Figure 1.2). The flexible membrane liner (FML) would be 60-mil high density polyethylene (HDPE), or equivalent. The leachate drainage layer would be either gravel or a synthetic drainage net specially designed to control liquids at the base of the landfill. If gravel or processed bedrock is used, perforated pipes would be spaced within the drainage layer to direct liquid flow to sump areas for collection and treatment, if required. Figure 4.10 also shows that the liner and leachate system would be covered with a select soil (operations) layer for protection from potential damage during landfilling operations.

4.3.4 LANDFILL CELL DEVELOPMENT

Figure 4.11 illustrates how landfill operations are conducted to minimize attraction of birds and vectors, odors, windblown debris, and water infiltration from occasional desert rainfalls. The MSW would be spread into cells, compacted with heavy equipment, and covered (daily cover) to keep the exposed open face as small as practical. This method results in the waste being dense and avoids the potential for older, decomposing waste to be exposed to the environment. The figure shows how containers would be emptied by tipping on a special piece of mobile equipment. Emptying also is accomplished using containers with "walking floors" which discharge the waste without being tipped.

The cross section in Figure 4.12 illustrates how, using current disposal technology, the landfill would be developed in approximately 10-foot high lifts (each lift is a single row or layer of waste 10-foot high). Wide soil stability berms would be initially constructed at permanent landfill perimeter locations, or temporary internal boundaries which would be exposed for long periods between landfill phases. These berms would provide increased stability for landfill slopes and would represent the final landfill cover at the ultimate landfill perimeter. The detailed disposal procedures would also be modified periodically to satisfy technological developments and regulations. The objective would always be to provide the required amount of environmental control using the most efficient procedures.

Shortly after being emptied at the landfill operating face, the MSW would be spread into a thin layer (e.g., 2 feet) by a bulldozer. It would then be compacted to a higher density using heavy equipment specially designed for operation on MSW landfills. This compaction serves the following very important functions:

- The higher density allows more MSW to be disposed per unit area within a landfill, thus providing a longer active life and reducing the need to develop new disposal facilities.

- Compacted trash is less permeable and remains relatively dry, thereby reducing the potential for leachate to develop and LFG to be generated.
- Compacted lifts are stronger and more stable so that the potential for long-term settlement of the landfill during and after its operating life is reduced.

Daily cover would be provided at any locations where waste would be exposed at the end of an operating day, consisting of a minimum of 6 inches of soil. This material would be provided to control vectors, fires, odors, blowing litter, and scavenging. Daily cover would also act to minimize precipitation infiltration prior to development of a new cell or placement of intermediate cover. In the future, daily cover could also consist of foams or synthetic materials which are presently being developed and tested for this purpose. The use of alternative materials would be approved by the RWQCB and County Department of Health Services.

Areas where daily cover would be exposed (i.e., not covered with an additional cell) for more than 180 days, would be covered with at least 1 foot of soil (or approved alternative material), called intermediate cover. The intermediate cover would also protect against vectors, fires, odors, blowing litter and scavenging, and would minimize precipitation infiltration. Due to its extra thickness, intermediate cover would be capable of withstanding anticipated longer periods of exposure.

The potential for wind to blow waste materials away from the landfill would be reduced prior to landfilling by material recovery operations which remove recyclable paper from the MSW, thereby reducing the volume of waste materials that could be affected by wind. The potential for wind to blow remaining materials would be further reduced at the landfill by:

- Developing the landfill operating surface at several levels so that operations could be conducted at lower, more sheltered levels on windy days.
- Providing portable fences adjacent to the face if shelter from the landfill configuration cannot be achieved.
- Minimizing the time between waste and daily cover placement so that MSW would be exposed to wind for shorter periods of time.

4.3.5 LFG CONTROL

The long-term decomposition of MSW results in the generation of LFG, which consists primarily of methane, carbon dioxide and trace amounts of volatile organic constituents. The magnitude and rate of LFG generated per pound of waste is expected to be relatively small for the Mesquite Regional Landfill because: (1) a portion of the biodegradable organic materials (e.g., recyclable paper, cardboard and green wastes) would have been removed, and (2) the remaining waste would be drier than usual because of the arid site conditions. The natural moisture conditions and organic content of the remaining MSW, such as those associated with food wastes, would still be adequate to result in some long-term waste degradation and LFG generation. Initially, the magnitude of generated LFG will be small, but the design would be based on the conservative assumption that the magnitude will eventually become substantial because of the large landfill size.

The landfill design, including the base liner system, would include provisions to collect the majority of the LFG to avoid: (1) development of air and methane mixtures which could be explosive, and (2) the transport of trace organics to the atmosphere and/or ground water. Primary components of the state-of-the-art LFG control system being designed for the Mesquite Regional Landfill are illustrated in Figures 4.13 and 4.14. The LFG control system consists of gravel-filled horizontal collector trenches, with perforated pipes, installed at approximately 50- and 250-foot vertical and horizontal spacings, respectively. Each perforated pipe would be connected to a vacuum header pipe on the outside of the landfill. The resulting vacuum applied throughout the landfill would collect and transport generated LFG to a common location for destruction by flaring or energy recovery usage, as discussed below. The exact configuration and spacing of gas collectors may change from time to time as control technology develops and site-specific experience is gained.

For the collection system illustrated in Figure 4.13, the trenches would be installed by excavating through the daily or intermediate cover at the top of each fifth, approximately 10-foot high, cell. The gravel in the trench would be separated from the compacted wastes by a geotextile filter membrane and the trench would be covered with a strip of low permeability liner. The perforated pipe would be made of flexible plastic tubing, as shown, or articulated sections of different diameter pipe to allow the system to conform to landfill settlements without damage. Vacuum header pipes on the landfill perimeter would be located along horizontal access benches in the slope, located at approximately 50-foot vertical intervals.

It is anticipated that initially, when generation rates are low, the collected LFG would be destroyed at a flare station. The flare station would be designed and operated to satisfy emission criteria established by the APCD.

As LFG generation rates increase with growth of the landfill, it may become economical to utilize the methane for commercial energy recovery. This would be accomplished by one of the following general types of methods:

- A gas turbine or boiler to generate electricity to support power requirements of the landfill and related facilities.
- A gas turbine or boiler to generate electricity for the facility, and for sale. That power could be fed into the existing system through the transmission line which currently provides electricity to the Mesquite Mine.
- A gas cleaning system to develop the methane into commercial quality. This methane would then be piped to an existing gas transmission line located near Niland (see Figure 1.1), or would be liquefied for offsite transport by trucks or railcar(s).
- A system to convert the methane to liquid fuel (e.g., diesel, methanol), a portion of which could potentially be used for onsite fuel requirements. Fuel not used at the site would be transported offsite by trucks or railcar(s).

The gas turbine, boiler, cleaning and/or conversion systems would also be designed to satisfy emission criteria of the APCD. The gas pipeline would be located within the new spur ROW and along the existing Southern Pacific main railroad line. If the methane is used for an energy recovery purpose, pilot test experiments may be conducted to determine if the generation rate could be increased without affecting overall landfill control performance. For example, small amounts of additional moisture could be applied to waste as it is placed into the landfill to enhance LFG generation without significantly increasing the potential for leachate generation. These types of pilot tests, if conducted, would only be implemented using procedures approved by the appropriate agencies, including the APCD, RWQCB, and County Department of Health Services. If successful and approved, the enhancement procedures would be incorporated into normal landfill operations and control.

Initially, flare or energy recovery systems may be installed at several locations near completed portions of the landfill. These systems may eventually be consolidated at one location. If this occurs, the facility would be located near the southwest corner of the final landfill configuration (Figures 1.4 and 1.5). This location would allow the gas header pipes to transport gas condensate to a common collection point for treatment and use at the container wash facility, for dust control, or for disposal by evaporation.

4.3.6 LANDFILL CLOSURE

The landfill would be closed with a cover system which prevents precipitation infiltration and avoids excessive soil erosion. The cover would also minimize long-term LFG emissions. The initially constructed perimeter stability berms (Section 4.3.4) would be placed to form the cover system for the sloped areas. The minimum thickness of soil at the perimeter berm would be about 7 feet as illustrated in Figure 4.12. The outside 6 inches to 1 foot of material on the slopes would consist of coarse, resistant fractions of the mine overburden materials, to minimize erosion during occasional thunderstorms. Because of the arid site conditions, it will not be possible to provide vegetative protection.

Flatter portions of the landfill top would be sloped to promote drainage to engineered control systems and prevent ponding. The final cover for these areas may include a thick soil cover or thinner soil combined with a synthetic FML to prevent infiltration. If used, the FML would be protected with geotextile fabric and a layer of soil to support construction equipment traffic. It is not anticipated that a special drainage collection layer above the FML would be required because the very high evaporation rate to rainfall ratio at the site would prevent the buildup of moisture in the top soil layer. The closure configuration would potentially vary with time to utilize new technology.

Nearly horizontal benches, sloped only to drain rainfall runoff, would be provided at about 50-foot vertical intervals along landfill slopes, as illustrated in Figure 4.14. These benches would:

- Provide intermediate drainage ditches with erosion protection for controlling storm runoff from the landfill surface.
- Provide access to gas control headers, which also would be located at about 50-foot vertical intervals.

A LFG surface collection system could be provided beneath the low permeability liner in flat portions of the landfill, if appropriate, to supplement the horizontal collection system, internal to the landfill. Example surface collection systems consist of either evenly spread trenches similar to those described in Section 4.3.5, or strips of permeable synthetic net immediately under the liner. Any surface collection configuration would be connected to the LFG control vacuum system.

The unvegetated slopes would generally blend into background conditions because natural slopes contain very little vegetation. Also, as discussed in Section 4.3.1 and illustrated in Figures 4.8 and 4.9, the landfill corners and top would be designed to be curvilinear and variable, as opposed to having long straight lines. This would reduce the "man-made" appearance of the landfill by making its configuration more similar to natural background conditions.

4.4 LANDFILL ACCESS

4.4.1 GENERAL

The primary highway access requirement for the Mesquite Regional Landfill would be associated with landfill operating personnel traveling to and from the site on State Highway 78 (Figures 1.4 and 1.5). Available Caltrans data indicates that existing Highway 78 daily traffic includes about 850 trips, of which about 250 are associated with current Mesquite Mine activities. It is anticipated that landfill employee traffic, mostly coming from the western portion of Imperial County, would initially include about 60 trips when the landfill would receive about 4,000 tpd MSW via the rail haul system. This traffic would increase to about 150 trips for an MSW disposal rate of 20,000 tpd. This traffic would be distributed for three landfill operating shifts. The increased landfill employee traffic would generally correspond to a reduction in existing Mesquite Gold Mine activities as mining operations are discontinued during the next 10 to 15 years, with little long-term change expected in net traffic.

Additional truck traffic could occur on Highway 78 if the county or local municipalities were to determine that the Mesquite Regional Landfill would be used for disposal of portions of MSW generated in the area. It is anticipated that locally derived wastes would be delivered only in transfer trucks (e.g., about 25 tons each) from one or several transfer stations which would be constructed to replace existing landfills in populated portions of western Imperial County. Currently, locally derived MSW is disposed at 11 landfills operated by the County Public Works Department (approximately 200 tpd) and 1 privately operated landfill (approximately 80 tpd).

If the portion of locally derived MSW presently handled at the County Public Works Department facilities were to be disposed at the Mesquite Regional Landfill, approximately 8 transfer trucks would travel daily along Highway 78. If all locally derived wastes were disposed at the Mesquite facility, about 12 trips in each direction would occur. This number could increase to about 20 trips per day as population grows during the life of the landfill. These deliveries would be spread over approximately 12 hours each day. Truck deliveries could be restricted to avoid the heaviest traffic to and from the Imperial Sand Dunes Recreational Area (e.g., afternoons before and mornings after winter weekends).

4.4.2 ACCESS ROAD

Access to the landfill would require modifications to the existing Mesquite Mine access road and an additional intersection at Highway 78. The access configurations for Projects "A" and "B" are shown in Figures 4.15 and 4.16, respectively. The new intersections would be designed to the requirements of a Caltrans encroachment permit.

For Project "A," the existing access road would be modified to provide an entrance to the landfill administrative offices and rail unloading intermodal facilities. This road would be used by all landfill employees and visitors, and for MSW trucks from local areas in the event the county or local municipalities decide to utilize the regional landfill. For this configuration, the existing mine access road would be rerouted around the east end of the intermodal to connect with the new Highway 78 intersection shown in Figure 4.15. Rights-of-way for the short sections of new access roads outside of the project boundary would be obtained from BLM. Considerations for these rights-of-way will be included in the environmental analysis for Project "A."

For Project "B," the existing mine access road would also be relocated east of the intermodal, but as shown in Figure 4.16, the new road would serve both the mine and the landfill intermodal facilities. Again, this road would be used by local MSW trucks in the event the county or local municipalities decide to utilize the landfill. The existing access road would be stopped and provided with a cul-de-sac or turnaround area at the south intermodal facility fence. A sign indicating that the road dead ends would be placed near the intersection of the old access road and Highway 78 to warn drivers that the road is not continuous.

4.4.3 FENCING

For security and to avoid unauthorized entry, the entire land area would be fenced as shown in Figures 1.4 and 1.5. A 6- to 8-foot-high cyclone fence with angled barbed wire would be used. If appropriate at some locations, the bottom of the fences may be designed to restrict tortoise entry to the project area.

The only facilities outside of the fenced area would be the administration building, the visitors parking lot, and the truck scales. A guardhouse would be located at the main facilities entrance, near the administration building.

Initially, the fence would encompass only the portion of the proposed landfill project area to the west of the existing mine access road (Figures 1.4 and 1.5). After mine closure, the fence would be extended to the eastern project boundary after abandonment of the portion of existing access road within the landfill area.

4.5 ADMINISTRATIVE AND MAINTENANCE FACILITIES

The majority of the landfill administrative and maintenance facilities would be located adjacent to the landfill intermodal (Section 4.2.3). The primary exception could be that certain existing mine-related structures (Figure 4.17) may continue to be used for landfill operations.

Figures 4.15 and 4.16 show the preliminary configuration of facilities at the intermodal area for Project "A" and "B," respectively. In both cases, the majority of the structures and employee-related facilities would be located near one end of the intermodal. This is necessary to allow for required traffic flow across individual rail tracks, which cannot occur where trains are parked along the center portion of the intermodal. Also, the container unloading/loading crane maintenance facility would be located near the end of the intermodal to allow cranes to be moved for repair at any time, including when trains are parked. As shown in the figures, "crane ways" would be provided at both ends of the intermodal to allow for controlled crossing traffic on specially paved areas.

Table 4.1 summarizes preliminary estimates of the types and sizes of structures required for the landfill and intermodal. Each structure would be designed and constructed according to building permits obtained from the Imperial County Planning Department. The structures would be painted an earthtone color, corresponding to background conditions in the desert area. The color used would be designated by the Imperial County Planning Department and/or BLM.

The following types of areas/facilities would also be provided at the approximate locations shown in Figures 4.15 and 4.16:

- Landfill employee and visitors parking areas.
- A truck scale.
- A container truck tractor parking area.
- Container storage and repair areas.
- Fuel storage facilities, contained within lined and bermed facilities.
- A container truck refueling area within a contained area.
- A container/truck wash area.
- A liquid treatment facility for container/truck washwater, LFG condensate and leachate, if any.
- A freshwater storage tank.
- An electrical substation.
- A flare station for destroying collected LFG.

- An energy recovery facility which could consist of facilities such as a gas turbine or boiler for generating electricity, or an LFG processing facility for producing commercial-grade methane.
- Utility corridors for electrical and water lines.

The intermodal and facilities areas would also contain lighting to support nighttime operations.

4.6 SURFACE WATER DRAINAGE CONTROL

Although it rains infrequently at the proposed landfill site, the control of surface water runoff would be an important design factor because measurable precipitation usually occurs as short, high intensity precipitation events. This condition results in high peak flows in drainage channels, which increase from no flow to maximum conditions within several minutes. Usually, the flowing conditions occur for less than one hour.

In addition to high peak flow conditions, drainage control facilities must be designed to:

- Accommodate high sediment loads due to upstream erosion of unvegetated washes, and especially to avoid conditions which could result in channel blockage due to sediment settling.
- Avoid excessive erosion of key control elements, especially since channels cannot be protected with natural vegetation.
- Discharge flows from constructed channels back to the same desert washes from which they were diverted, to the extent practical. This avoids the creation of new erosion patterns on the desert floor and the need for modifications to downstream facilities such as the main Southern Pacific Railroad line.

Prior studies (St. Clair Research Systems, Inc., 1984) have shown that return of the flows to the same areas is not required to support for existing vegetation, however. Instead, existing vegetation growth is primarily supported by moisture from local precipitation.

Substantial hydrology experience exists for the area because of the successful design and operation of storm runoff control facilities for the Mesquite Mine and recently relocated Highway 78. Flows from the existing mine area presently discharge across the highway at the three erosion protected washes (swales), shown in Figure 4.18. The flow at Wash A is largest, designed for a flow of about 4,900 cfs for the 100-year recurrence thunderstorm. Washes B and C were designed for 100-year flows of about 1,200 and 1,100 cfs, respectively. Flows at both of these latter washes have substantially been reduced as a result of watershed area reductions associated with mine development.

Stormwater diverted around the landfill, and runoff directly from the facility, would be directed to the existing three highway wash crossings, following the drainage pathways illustrated in Figures 4.19 and 4.20 for Projects "A" and "B." The most important diversion channel would be that located along the north and west sides of the landfill. That channel would receive the largest flow through the mining area, originating from washes extending into the Chocolate Mountains. It may be appropriate to provide a detention basin along this drainage (possibly on the mine property) to reduce peak flows and sediment loads which otherwise would have to be transported around the northwest landfill corner.

The proposed spur line is aligned to be parallel to existing runoff patterns and therefore would not require any major diversion facilities. As indicated in Figure 4.4, a combination of berms and ditches would be constructed along the northwest side of the spur to control any small flow which potentially would be intercepted by the railroad. That flow would be discharged through a drainage structure provided beneath the bend in the spur leading to the main Southern Pacific Railroad line.

4.7 POTENTIAL ANCILLARY LAND USE ACTIVITIES

Approximately 100 and 600 acres, for Projects "A" and "B," respectively, would be available for future industrial activities, ancillary to the landfill, if appropriate. The most likely activity would be an "industrial park" to reprocess recycled materials, brought to the site by rail from MRFs located at the transfer stations near the MSW origin. These ancillary industrial activities are not proposed as part of the landfill project at this time and will not be included in the CEQA and NEPA environmental analyses. Separate future environmental evaluations would be required for any industrial facility located onsite, at the time of its planning.

Temporary onsite storage of certain recycled materials may occur to supplement storage capacities at MSW originating transfer stations and MRFs. Such storage would include only baled materials covered for protection from the weather and would be limited to a maximum quantity of 600,000 tons (approximately 10 percent of the maximum annual MSW disposal rate). The temporary storage would only occur in undeveloped portions of the landfill footprint. No recycled materials would be stored for longer than two years. After that period, the material would either be returned to the originating transfer station or MRF, or it would be disposed in the landfill.

4.8 WATER SUPPLY, SANITATION AND UTILITIES

Example uses of water at the landfill would be for:

- The container/truck wash area.
- Dust control.
- Compaction of soils.
- Conditioning of the MSW, if a pilot program for LFG enhancement is implemented (see Section 4.3.5).

This water would be obtained from the existing Gold Fields well field located approximately three miles south of the project area (Figure 1.2). Appropriate approvals, to utilize the existing well field for landfill construction and operations, would be obtained. Initial calculations indicate that the combination of Mesquite Mine and landfill water usages would not exceed the existing maximum permitted amount for annual well field withdrawal rate of 4,033 gpm. As shown in Figure 1.2, a water pipeline currently extends from the well field to the Mesquite Mine. An extension to that pipeline would be built to bring water to storage tanks located in the operations and maintenance facilities area near the intermodal. From these storage tanks, water would be transferred by truck or ancillary pipelines to various project locations, as needed.

Potable water would be obtained from either of two sources. Well water could be used, after treatment and softening at an onsite water treatment facility, or bottled water trucked in and stored onsite.

Electricity would be the primary source of power for landfill operations. Most power usage would be for pumping of water, operation of the LFG control system, and nighttime lighting in the intermodal area and along the road to and at the landfill working face. Other operations and maintenance facilities would require minor amounts of electricity.

Electrical power needs for the landfill would be obtained from the existing IID 92 kV power line and substation at the Mesquite Mine (Figure 1.2). An extension from the existing IID line would be built to an additional substation located near the intermodal facilities. For Project "A," a right-of-way may be required from the BLM to construct this extension. The potential right-of-way will be included in the environmental analysis for Project "A." Standby generators fueled by LFG, methane, or imported fuel such as diesel would be available to provide power for essential facilities in the event of power outages.

In the future, if an energy recovery system is constructed to use methane from the landfill, electrical power may be generated onsite.

Sanitation would be handled in the same manner at the Mesquite Mine, by installing one or more septic tanks and leach fields. The septic tanks would be pumped periodically to keep the system biologically active and in good working condition. The pumped materials would be transported offsite to an appropriate disposal facility.

4.9 CONSTRUCTION AND OPERATING PERSONNEL AND EQUIPMENT

Approximately 10 months of construction activity would occur prior to delivery of MSW to the landfill. This construction would include, but not be limited to, the following facilities:

- The railroad spur.
- The realigned access road.
- The initial operating section of the intermodal.
- Roads to and from the initial landfilling area.
- The base liner and leachate collection system in the initial landfilling area.
- Drainage facilities for initial operations.
- Initial buildings and facilities (e.g., container-wash facility) in the operations and maintenance area.
- Pipelines and power lines.
- Fencing.
- Initial monitoring systems.

These construction activities would be performed by a construction crew of approximately 150 personnel who would be hired to specifically conduct these tasks.

Construction activities would continue as a full-time ongoing process after landfill operations have commenced. Approximately 10 to 20 people would perform the following types of activities during landfill operations:

- Construction of base liner and leachate collection system for subsequent landfill expansions.
- Expansion of sections of the intermodal as arriving MSW volume increases.
- Modification and expansion of drainage facilities as the landfill expands.
- Expansion of buildings in the operations and maintenance area as the landfill grows.
- Expansion of the LFG collection system.
- Expansion of monitoring systems.

As appropriate, subcontractors would be hired to assist full-time personnel in performing certain specialized construction activities such as the placement of liner systems.

Table 4.2 shows preliminary estimates of daily operating personnel, according to job classification, required for initial landfill operations (4,000 tpd) and for the anticipated peak operation (20,000 tpd). As shown, approximately 268 people could be employed for daily operations at the Mesquite Regional Landfill during peak activities.

Table 4.3 contains a summary of anticipated landfill equipment required for daily operations.

4.10 FACILITY CLOSURE AND POSTCLOSURE ACTIVITIES

4.10.1 LANDFILL FACILITIES

In much the same way that the landfill and supporting facilities would be developed and constructed in phases, the landfill would also be closed in phases as operating segments are completed. These activities would be conducted in a manner consistent with relevant federal and state laws regarding landfill closure and postclosure.

The exterior walls and surface of the landfill would be designed and constructed so that final cover can be placed as they are built (Section 4.3.6). LFG management and control systems would be constructed as landfill lifts are completed. Leachate management and collection systems would also be constructed as the landfill develops, as would monitoring systems required for the various project permits. As a landfill operating segment is completed, surface topography and local drainage patterns would be finalized, and the following activities would begin:

- Landfill surface care.
- Regular inspection and record keeping.
- Monitoring (e.g., LFG, ground water, and leachate).
- Collection and treatment of leachate, if any.
- LFG management and control.
- General site administration and maintenance.

Through this process, facility closure activities and planning would occur throughout the life of the landfill. In the years leading up to the time when landfill MSW capacity would be reached, procedures for closure of onsite structures would be finalized. Plans would be made for:

- Removal of the rail spur.
- Closure of the intermodal.
- Removal or closure of certain onsite structures (as appropriate).
- Recontouring and regrading of certain onsite roads (as appropriate).
- Postlandfill disposition of utility structures (e.g., electrical and gas lines).

At this time, consideration would also be given to any postlandfill long-term land uses that are desired by the county or local residents, such as recreation on the specially conformed landfill surface, or continued industrial use of certain onsite facilities.

Recently proposed federal regulations (CFR Title 40, proposed Part 258) which set criteria for municipal solid waste landfills, require that MSW landfill owners/operators provide assurance of their ability to finance closure activities, postclosure care and monitoring, and potential corrective or remedial actions. Several mechanisms to demonstrate financial assurance are allowed by these regulations, with the specifics of implementation governed by state law. The applicant has not finally determined the financial assurance mechanism which would be provided for the Mesquite Regional Landfill, although a trust fund of money collected as part of the "tipping" fee is the favored alternative so far. Under this approach, the trust fund is built up beginning on the first day of disposal. Then money would be withdrawn from the trust fund at appropriate times during the life of the landfill to finance ongoing closure and postclosure activities. A final decision as to the desired financial assurance mechanism would be made in conjunction with obtaining the required Facilities Permit from the Imperial County Environmental Health Services Department.

Existing regulations require that postclosure care and monitoring continue for at least 30 years after closure of the facility. At the end of the 30-year period, a decision would be made by the regulators to extend or not extend postclosure care and monitoring for an additional 30 years based on a determination of whether the landfill poses any threat to public health or safety, or to the environment.

Closure and postclosure activities would be modified, as appropriate, to remain consistent with changes in federal and state laws regarding landfill activities.

4.10.2 CERTAIN MINE ACTIVITIES

Closure and postclosure activities at the Mesquite Mine have also been performed in phases throughout the life of the mine in accordance with the approved mine Reclamation Plan. During the final years of mine operations the following major closure activities, among others, would be performed in accordance with the Reclamation Plan:

- Access to mine pits will be restricted with fences, signs and berms.
- The top surfaces of stockpiles will be graded as necessary for proper drainage.
- Roads that may have long-term beneficial use for the public will be left in place. Other roads will be regraded and/or ditched to control erosion.
- Buildings and structures will be dismantled, as appropriate. Concrete slabs and footings may remain for future use.
- Aboveground water and electrical lines and systems, with the exception of the main supply line and water tanks or storage reservoirs, will be removed from the site. Underground sewer systems will be capped below grade and covered.

As landfill operations begin, these mine activities will continue uninterrupted except that reclamation of the overburden and ore residue stockpiles would also involve transfer of these materials to the landfill area for use as daily and intermediate cover. This activity may result in temporary delay of regrading of certain roads that are needed to access these stockpiles. Extensions to the main electrical and water supply lines may also be built to support landfill operations. The primary crusher may be used to make materials from the stockpiles suitable for use in the landfill. The mine maintenance shop may potentially be used to supplement maintenance facilities located near the intermodal. Dismantling of these structures would occur as part of the landfill closure activities discussed in the previous section.

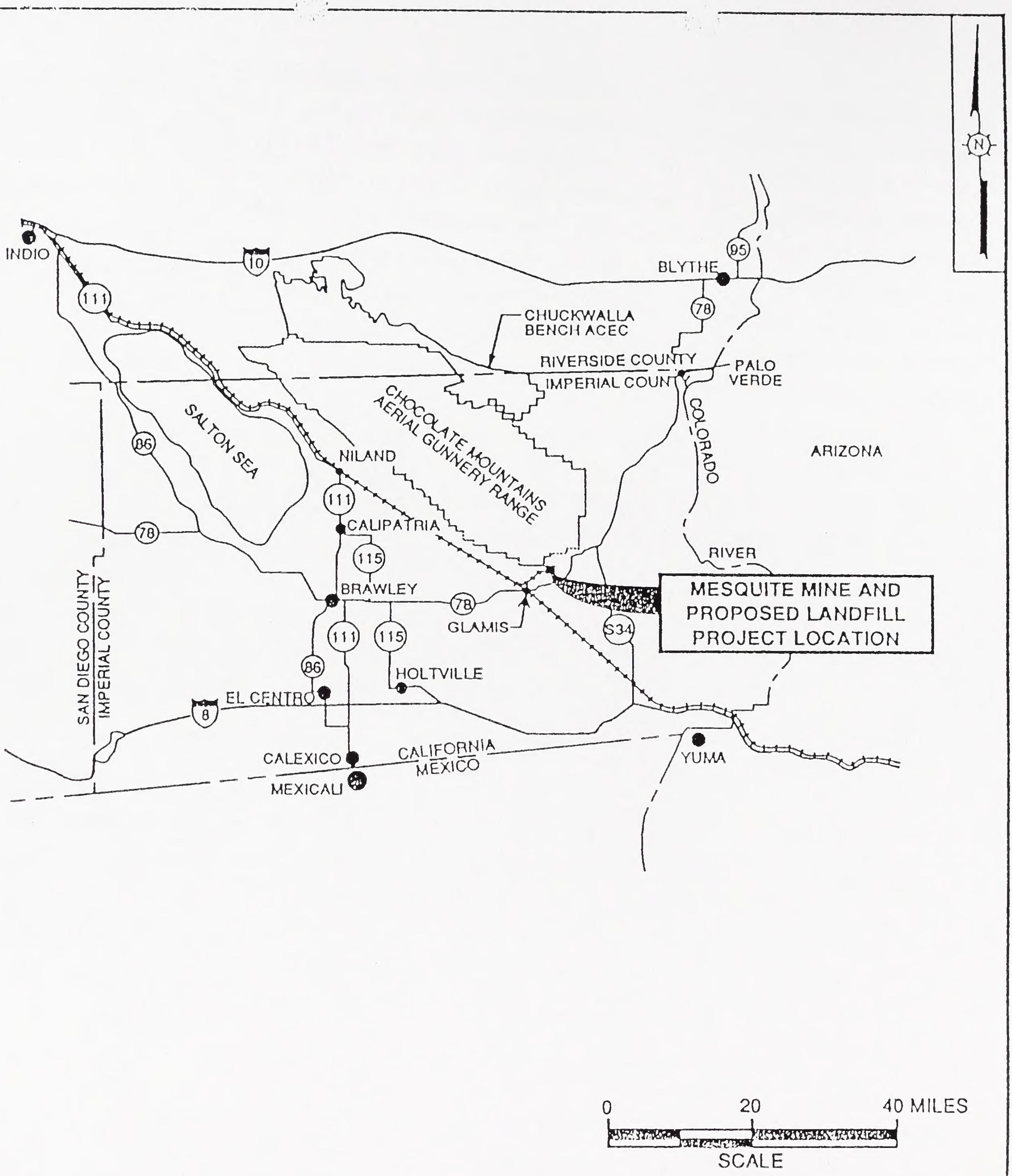


FIGURE 1.1

REGIONAL LOCATION MAP

MESQUITE REGIONAL LANDFILL

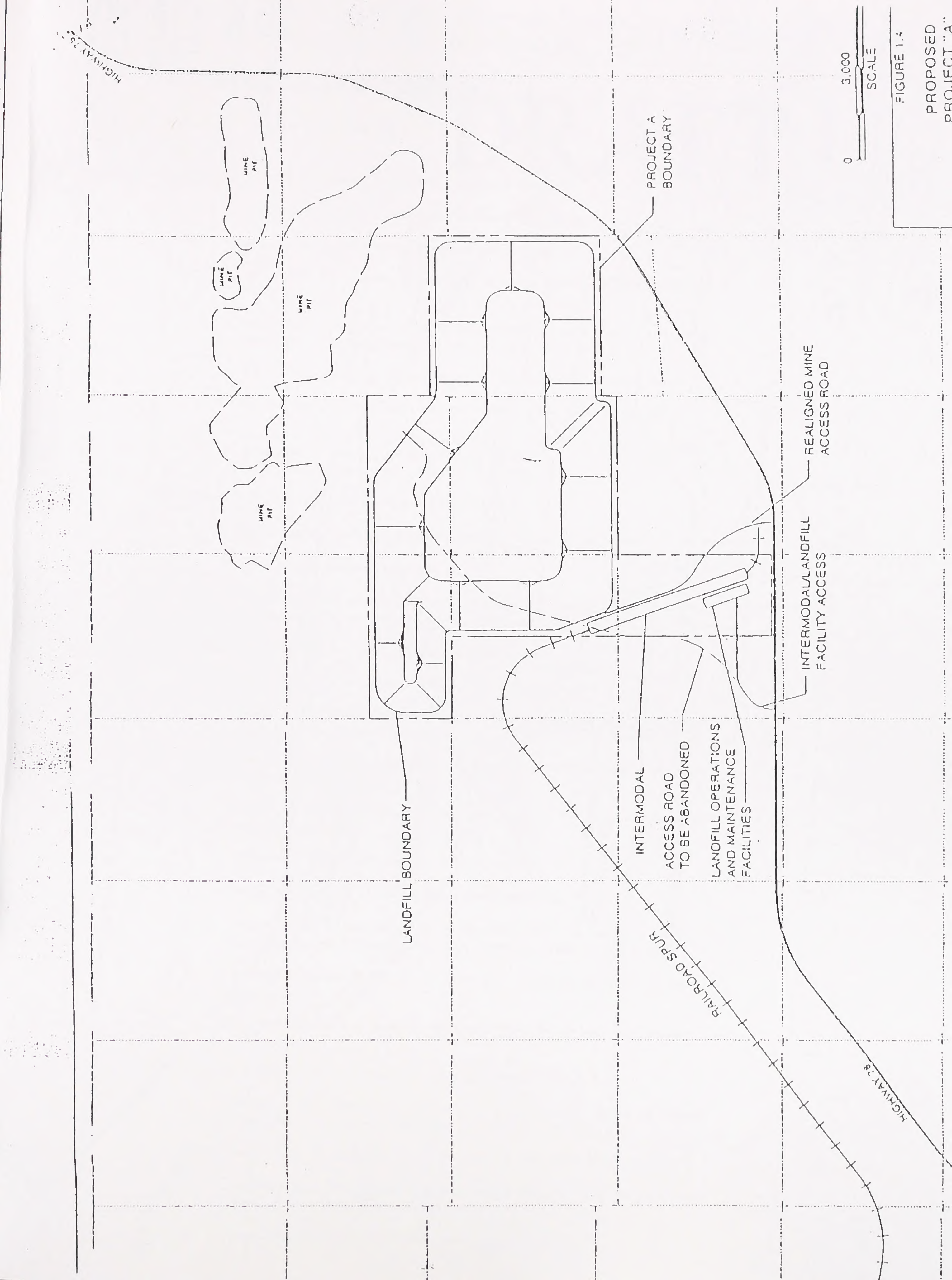

HIGHWAY 28
MINE PIT
MINE PIT
MINE PIT
MINE PIT
PROJECT A BOUNDARY
LANDFILL BOUNDARY
REALIGNED MINE ACCESS ROAD
INTERMODAL/LANDFILL FACILITY ACCESS
INTERMODAL
ACCESS ROAD TO BE ABANDONED
LANDFILL OPERATIONS AND MAINTENANCE FACILITIES
RAILROAD SPUR
HIGHWAY 28
0
3,000
SCALE

FIGURE 1.4

PROPOSED PROJECT "A"

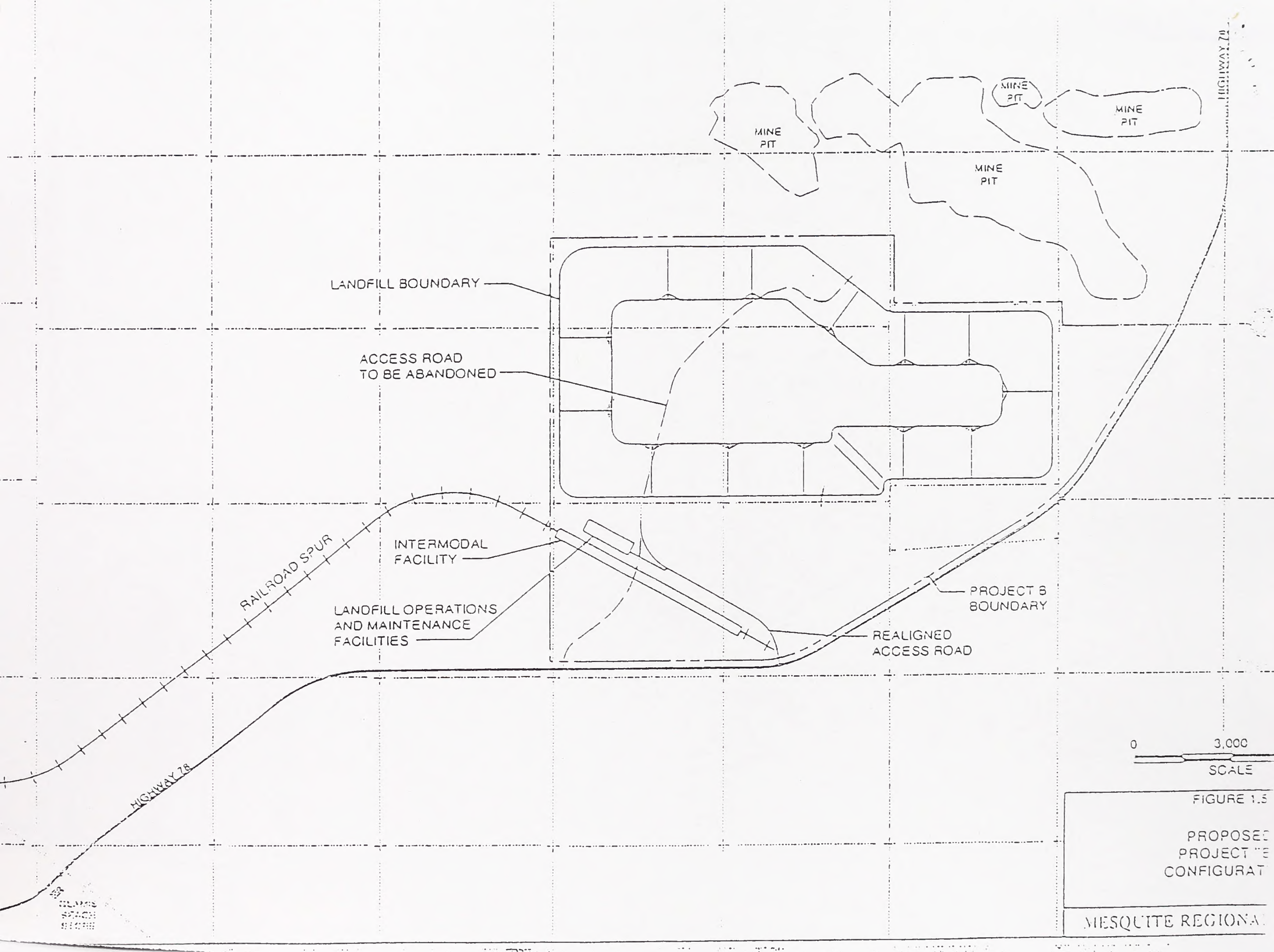


FIGURE 1.5

PROPOSE
PROJECT "
CONFIGURAT

MESQUITE REGIONA

NEW OPERATIONS
MESQUITE REGIONAL LANDFILL

NVIRONMENTAL IMPACT ANALYSIS

"INITIAL STUDY" CHECKLIST)

DRAFT

		YES	MAYBE	NO
	Earth: Will the proposal result in:			
a.	Change in topography or ground surface relief features?	X		
b.	Unstable earth conditions or changes in geologic substructures?		X	
c.	The destruction, covering or modification of any unique geologic or physical features?		X	
d.	Exposure of people or property to geologic hazards such earthquakes, landslides, mudslides, ground failure, or similar hazards?	X		
e.	Disruptions, displacements, compaction, or overcrowding of the soil?	X		
f.	Any increase in wind or water erosion of soils, either on or off the site?	X		
g.	Changes in deposition or erosion of beach sands, or changes in siltation, deposition or erosion which may modify the channel or a river or stream or the bed of the ocean or any bay, inlet or lake?			X
2.	**Air: Will the proposal result in:**			
a.	Substantial air emissions or deterioration of ambient air quality?	X		
b.	The creation of objectionable odors?	X		
c.	Alteration of air movement, moisture, or temperature, or any change in climate, either locally or regionally?	X		
3.	**Water: Will the proposal result in:**			
a.	Alteration of the direction or rate of flow of ground waters?		X	
b.	Change in the quantity of ground waters, either through direct additions or withdrawals, or through interception of an aquifer by cuts or excavations?	X		
c.	Changes in currents, or the course or direction of water movements, in either marine or fresh waters?		X	
d.	Changes in absorption rates, drainage patterns, or the rate and amount of surface water runoff?	X		
e.	Alterations to the course or flow of flood waters?	X		
f.	Change in the amount of surface water in any water body?		X	
g.	Discharge into surface waters, or in any alteration of surface water quality, including but not limited to temperature, dissolved oxygen or turbidity?		X	
h.	Substantial reduction in the amount of water otherwise available for public water supplies?	X		
i.	Exposure of people or property to water related hazards such as flooding or tidal waves?		X	
4.	**Plant Life: Will the proposal result in:**			
a.	Change in the diversity of species, or number of any species of plants (including trees, shrubs, grass, crops, and aquatic plants)?	X		
b.	Reduction of the numbers of any unique, rare, or endangered species of plants?		X	
c.	Introduction of new species of plants into an area, or in a barrier to the normal replenishment of existing species?	X		
d.	Reduction in acreage of any agricultural crop?			X

		Y	M	N
f.	Limiting or eliminating certain agricultural operations or ~~cultural~~ AGRICULTURAL practices on adjoining land?			X
	Animal Life: Will the proposal result in:			
a.	Change in the diversity of species, or number of any species of animals (birds, land animals including reptiles, fish and shellfish, benthic organisms, or insects)?	X		
b.	Reduction of the numbers of any unique, rare or endangered species of animals?	X		
c.	Introduction of new species of animals into an area, or result in a barrier to the migration or movement of animals?	X		
d.	Deterioration to existing fish or wildlife habitat?	X		
	Noise: Will the proposal result in:			
a.	Increases in existing noise levels?	X		
b.	Exposure of people to severe noise levels?		X	
	Light & Glare: Will the proposal produce new light or glare?	X		
	Land Use: Will the proposal result in a substantial alteration of the present or planned land use of an area?	X		
9.	**Natural Resources: Will the proposal result in an increase in the rate or use of any natural resources?**	X		
10.	**Risk of Upset: Will the proposal involve:**			
a.	A risk of an explosion or the release of hazardous substances (including, but not limited to, oil, pesticides, chemicals, or radiation) in the event of an accident or upset conditions?	X		
b.	Possible interference with an emergency response plan or an emergency evacuation plan?		X	
11.	**Population: Will the proposal alter the location, distribution, density or growth rate of the human population of an area?**		X	
12.	**Housing: Will the proposal affect existing housing or create a demand for additional housing?**	X		
13.	**Transportation/Circulation: Will the proposal result in:**			
a.	Generation of substantial additional vehicular movement?	X		
b.	Effects on existing parking facilities, or demand for new parking?	X		
c.	Substantial impact upon existing transportation systems?	X		
d.	Alterations to present patterns of circulation or movement of people and/or goods?	X		
e.	Alterations to waterborne, Train or air traffic?	X		
f.	Increase in traffic hazards to motor vehicles, bicyclists or pedestrians?	X		

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		YES	MAYBE	NO
	Public Services: Will the proposal have an effect upon, or result in a need for new or altered governmental services in any of the following areas:			
a.	Fire protection?	X		
b.	Police protection?	X		
c.	Schools?	X		
d.	Parks or other recreational facilities?	X		
e.	Maintenance of public facilities, including roads?	X		
f.	Other governmental services?	X		
	Energy: Will the proposal result in:			
a.	Use of substantial amounts of fuel or energy?	X		
b.	Substantial increase in demand on existing sources of energy, or require the development of new sources of energy?		X	
	Utilities: Will the proposal result in a need for new systems or substantial alterations to any of the following?			
a.	Power or natural gas?	X		
b.	Communications systems?	X		
c.	Water?		X	
d.	Sewer or septic tanks?		X	
e.	Storm water drainage?	X		
f.	Solid waste and disposal?	X		
	Human Health: Will the proposal result in:			
a.	Creation of any health hazard or potential health hazard (excluding mental health)?	X		
b.	Exposure of people to potential health hazards?	X		
	Aesthetics: Will the proposal result in the obstruction of any scenic vista or view open to the public, or will the proposal result in the creation of an aesthetically offensive site open to public view?	X		
	Recreation: Will the proposal result in an impact upon the quality or quantity of existing recreational opportunities?	X		
	Cultural Resources: Will the proposal result in:			
a.	Alteration of or destruction of a significant archaeological, prehistorical or historical site, structure, object or building?	X		
b.	An alteration of, or destruction of, a significant paleontological site?		X	
c.	Physical change which would affect unique ethnic cultural values?		X	
d.	Restrict existing religious or sacred uses within the potential impact area?		X	

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ENVIRONMENTAL DISCUSSION

The following discussion briefly describes the areas of environmental concern which are noted as "yes" or "maybe" in response to the environmental checklist form prepared by the County of Imperial Planning Department for the proposed Mesquite Regional Landfill. This section identifies those areas which will require additional analysis and documentation of potentially significant environmental impacts. The numbers labeling the following paragraphs refer to the number of each item in the County of Imperial's initial study checklist.

1. Earth

a. The proposed Mesquite Regional Landfill would result in a change in the site's topography. The basic landfill configuration would be formed above the existing grade. The landfill configuration would have a final height of between 375 and 475 feet.

b. The proposed landfill would be built above the existing ground surface. The landfill would be designed with side slopes which would vary from 3:1 at the bottom to 5:1 near the top. In addition, benches, at least 20 feet wide, would be constructed at regular intervals such that unstable earth conditions would not result.

c. Construction of the proposed landfill would require the leveling of the topographic features known as Alice June Hills and Thunderbird.

d. The project is not anticipated to expose people or property to geologic hazards. The closest confirmed active fault to the landfill site is the Imperial fault, which is approximately 33 miles to the west. Gradual side slopes and an extensive system of berms, ditches, and flood diversion channels would be designed to prevent the possibility of landslides or mud slides on the landfill surface. Site-specific investigations, including aerial photo interpretations, geophysical surveys, site geologic mapping and trenching, have shown that active faults do not exist at the proposed landfill site.

The proposed landfill would be designed with gradual side slopes and an extensive system of berms, ditches, and flood diversion channels to prevent the possibility of landslides or mudslides on the landfill surface. These issues will be discussed in further detail in the EIS/EIR.

e. Construction of the landfill and support facilities would require grading and compaction of on-site soils. A composite liner consisting of clay and high density polyethylene (HDPE) would be used to contain any leachate and/or landfill gas. Also, certain areas on-site would be paved to support on-site traffic. This would result in an overcovering of the soil.

f. The proposed project would require the movement of on-site soils (cover material) to cover the refuse on an almost continual basis during daily operations. This soil will be exposed to wind and rain. Wind erosion of soils would be prevented by spraying of roads with water trucks and the use of coarse erosion-resistant soils for intermediate and final cover material.

Stormwater runoff control facilities for the existing Mesquite Mine have been successfully designed and operated. This experience would be used to design drainage systems for the landfill which would be integrated with the Mesquite Mine system as the landfill expands. The EIS/EIR will address mitigation measures to reduce wind and water erosion both on- and off-site.

2. **Air**

a. Fugitive dust could be generated by equipment operating on the landfill, including container trucks, scrapers, graders, compactors, dozers, and loaders; cover-soil loading and placement operations; and wind blowing across freshly graded areas. Most of this dust would be associated with wheeled equipment moving on unpaved roads. The fugitive dust generation would be controlled by paving the roads or providing dust surfactants on permanent portions of roads. Wetting unpaved road surfaces throughout the day with water would also reduce dust generation. In addition, prewetting cover material prior to excavation and preparation for its placement and compaction would also be used to control fugitive dust, as needed. These approaches are anticipated to control up to 90 percent of the possible fugitive dust emissions.

b. The proposed landfill could result in the creation of objectionable odors as a result of the anaerobic decay of organic matter. In order to reduce odor impacts, municipal solid waste (MSW) containers would be used during transport and daily cover would be placed on disposal areas at least every 24 hours. The MSW containers would be sealed during transport to minimize odor potential. In addition, a landfill gas (LFG) disposal system will be provided which will limit nuisance odors and will reduce smog-forming reactive organic gases and toxic air contaminants.

c. It is not expected that the proposed landfill would have a substantial effect on local or regional meteorology.

The refuse that would be landfilled is expected to have a higher moisture content than the existing soils at the proposed site. Also, water would be used to control dust. Given the proximity of leach pads and waste overburden piles associated with the gold mine, the fact that refuse would be buried within a very short time after being removed from the enclosed shipping container, and the fact that only small portions of the site would be watered for dust control on any given day, the increase in moisture is not expected to be substantial either on- or off-site.

Some additional paving would occur on-site. This will likely increase temperatures somewhat on-site. This would be partially offset by the use of water for dust control. In all, temperatures are not expected to change noticeably on- or off-site.

The changes described above would not be of sufficient magnitude to change climate either locally of regionally.

The air quality impacts resulting from construction, preparation, operation, and closure of the proposed landfill will be analyzed. This analysis will include impacts caused by exhaust emissions from vehicles and machinery, dust emissions, odors and the potential for the emission of methane and other gases at the site.

3. Water

a, b. The proposed landfill project would not affect the direction or rate of flow of the groundwater; nor would it affect the quantity of groundwater available to other users. The proposed landfill is located within a subbasin of the Amos-Olgiby Hydrologic Unit which does not contain water-bearing alluvium. Instead, groundwater in the project area is limited to small quantities, associated with fractures and joints in the rocks. Extensive drilling in the project area has located these limited groundwater resources as between 100 and 300 feet below the desert surface. As a result, due to the lack of any significant water resources in the project area, the landfill would not directly affect groundwater flow or quantity near the site.

Project water needs would be obtained from the existing Gold Fields well field, which is located about three miles south of the project area where water-bearing alluvium of the Amos-Olgiby Unit can be found. Initial calculations indicate that the combined water demands of Mesquite Mine and the proposed landfill would not exceed the existing maximum permitted withdrawal rate of 4,033 ac-ft per year. The proposed project's effect on groundwater will be addressed in the EIS/EIR.

c. The project site is located within a closed area which does not drain to any surface streams or water bodies. As a result, the project would not change currents, or the course of direction of water movements, in either marine or fresh waters.

d. The proposed project would change drainage patterns in the immediate project area and flow would be returned to its natural course to the extent possible.

The overall absorption rate for the project area would remain essentially the same, though the absorption rate at specific locations may vary due to on-site facilities. A change in the rate and amount of surface water runoff from the site area as it flows through the washes across Highway 78 is not expected to be substantial.

e. The proposed project could result in temporary alterations to the course of flood water. This issue will be addressed in the EIS/EIR.

f. The project site is located within an area that does not contain any surface streams or water bodies. Therefore, the proposed project would not result in a change in the amount of surface water in any water body.

g. The proposed project would not result in any discharge to surface waters or cause any change in surface water quality. Surface water drainage would be carefully controlled. In addition, the small amount of runoff from project areas where potential water quality concerns may exist would be collected, tested and treated, if required, prior to discharge into natural channels. Appropriate measures will be incorporated into the project design to divert stormwater around the landfill, collect landfill gas, and control erosion. These measures will be identified in the EIS/EIR.

h. A reduction in the amount of water that is available to the public could occur if the landfill contaminated the groundwater supply. This may occur through two pathways, which include leachate or landfill gas migration into the groundwater. Given the hydrogeology of the site, as well as state and federal regulations on landfill design and operations, it appears to be unlikely that groundwater would be contaminated at this site. The EIS/EIR will present the hydrogeology and the landfill design features included in the proposed project to prevent leachate generation or migration and landfill gas migration. Please see Item 3.a,b for a discussion of the proposed project's water needs.

i. The successful design and operation of the stormwater runoff control system for the Mesquite Mine has not resulted in exposure of people or property to water-related hazards such as flooding. The landfill stormwater runoff control system would be designed to be integrated with the Mesquite Mine system as the landfill expands. Like the Mesquite Mine system, the landfill stormwater runoff control system would not result in exposure of people or property to flooding. The potential for increased stormwater runoff will be addressed in the EIS/EIR.

4. Plant Life

a. Existing vegetation on-site is classified as creosote bush scrub and would be removed during site grading. This would result in a reduction in the number of plants. The proposed site is biologically similar to large areas of adjacent habitat and non-native species are not proposed for site revegetation. Therefore, the proposed project would not change the diversity of plant species.

b. Only one sensitive plant, the fairy duster (*Calliandra eriophylla)* is presently known on-site. This plant is not on any state or federal list but is considered sensitive by the California Native Plant Society. Additional biological surveys will be conducted and included in the EIS/EIR.

c. It is proposed that natural species will be used to revegetate the site. Therefore, it is not expected that the proposed project would result in the introduction of new species of plants into the area or in a barrier to the normal replenishment of existing species.

5. Animal Life

a, b. The proposed Mesquite Regional Landfill could result in a change in the number of species. Several wildlife species which may have populations on or near the project site have special status as either "Sensitive," "Endangered," or "Rare." The species of greatest concern relative to the proposed project is the desert tortoise. The desert tortoise is known to occur in the area, but at a lower density than in other California desert areas. Gold Fields has participated with appropriate federal and state agencies since 1984 to establish mitigation procedures for the disturbance of tortoise habitat in the area.

c. Scavenger birds that could be attracted to the landfill are known to inhabit the project vicinity. The proposed project would be located just south of the existing Mesquite Mine; however, the proposed project could result in a diversion to the migration or movement of animals. Wide ranging animals that would be susceptible to this potential effect would be coyote, kit fox, and burro deer.

d. The proposed project would establish a regional landfill in an area that is either classified as Category III Desert Tortoise Habitat or is adjacent to Category III Habitat. In order to obtain ownership of the federal lands that would be required for the proposed landfill, the applicants will conduct a land exchange with the Bureau of Land Management (BLM). The applicant has identified land to be offered to BLM, a portion of which is classified as Category I Desert Tortoise Habitat near the Chuckwalla Bench Area of Critical Environmental Concern (ACEC). Category I Habitat is more highly used by the desert tortoise than Category III Habitat. In addition, land of unique scenic value in the Santa Rosa Mountains National Scenic Area (SRMNSA) has also been identified as land that would be offered to BLM as part of the land exchange.

The EIS/EIR will assess the direct, in-direct, and cumulative impacts to wildlife habitat and rare, endangered, threatened, and sensitive plant and animal species. The biological impacts of the proposed land exchange will also be addressed.

6. Noise

a. The construction and operation of a landfill and rail intermodal would increase noise levels in the site area over existing levels. These noises are not expected to have off-site effects due to the remoteness of the site. Noise along the rail spur route would also increase as a result of up to ten train trips per day during peak landfill operations.

b. The proposed landfill would be approximately three miles from the nearest permanent residence, and five miles southwest of the Imperial Sand Dunes Recreational Area. The rail line runs through various land uses. While it is not anticipated that the proposed landfill or rail delivery would expose people to severe noise levels, the increased noise levels will be evaluated in relation to all applicable noise standards.

The noise impacts associated with the construction and operation of the proposed Mesquite Regional Landfill will be addressed in the EIS/EIR.

7. Light and Glare

Nighttime lighting would be provided at the intermodal area and along the road to the landfill working face. The effects of light and glare would be controlled, where possible, through the use of directional lighting and other shielding techniques. The EIS/EIR will address the effects of light and glare at the proposed Mesquite Regional Landfill.

8. Land Use

The proposed landfill would be located primarily on the southern portions of the existing Mesquite Mine. This area would be converted to a Class III landfill. The site is located within an area zoned S-Open Space under the Imperial County General Plan. The majority of land surrounding the site is within the BLM California Desert Conservation Area classified as Multiple use, Class M (Moderate Use).

An assessment of the proposed project's effect on existing and planned land use resulting from the construction, operation, and closure of the landfill will be evaluated in terms of noise, traffic, odors, air quality, and visual impacts. Potential conflicts with the planning goals of the Imperial County General Plan and the guidelines of the BLM California Desert Conservation Area Plan will also be addressed.

9. Natural Resources

Existing overburden and ore residue piles at the Mesquite Mine would be put to productive post-mining use as materials for daily, intermediate, and final cover at the proposed landfill. Water pumped from the Mesquite Mine well field would be used to supply project water needs. Initial calculations indicate that combined usage of the wells by the mine and the landfill would not exceed the existing maximum permitted withdrawal rate of 4,033 ac-ft per year. The effects of transfer of gravel resources from public ownership to Gold Fields would be minimized by using pockets of surfacial gravel encountered during landfill or rail spur facilities development as aggregate for construction. In areas where no landfill or rail spur related construction is planned, current gravel withdrawal activities would be allowed to continue subject to appropriate agreements with Gold Fields and the BLM. The project would not result in an increase in the rate or use of other natural resources.

The landfill would not be located in the existing mine pits which are still in operation. The mine pits would contain residual mineral resources at the time of the mine's closure in 10 to 15 years. The pits would remain open after closure of the mine so that deeper and/or lower grade ore can be mined in the future if new extraction technologies are developed.

Within the landfill, MSW would decompose resulting in the creation of landfill gas. Landfill gas could be scrubbed and converted to natural gas or liquified petroleum gas. Use of this gas would offset the need to use natural resources to generate electricity or perform work.

10. Risk of Upset

a. The proposed Mesquite Regional Landfill would be designated exclusively as a California Class III landfill for MSW only. Class III landfills are for nonhazardous solid waste. Existing federal and state regulations control hazardous materials and wastes and prevent their improper disposal. Because of these regulations, large quantities of hazardous material and wastes are not typically found in the municipal solid waste stream.

The long-term decomposition of MSW results in the generation of landfill gas (LFG). LFG consists primarily of methane, carbon dioxide and trace amounts of volatile organic constituents. The magnitude and rate of LFG generated per pound of waste is expected to be relatively small for the proposed landfill because a portion of the biodegradable organic materials would have been removed prior to transport. In addition, the remaining waste would be drier than usual because of the arid site conditions. The landfill design, including the base liner system, would include provisions to collect the majority of the LFG to avoid development of air and methane mixtures which could be potentially explosive. The LFG collection system would also prevent the transport of trace organics to the atmosphere and/or groundwater. The EIS/EIR will address the potential for public exposure to hazardous materials. The EIS/EIR will also assess the potential explosive hazard associated with LFG.

b. The proposed Mesquite Regional Landfill would accept municipal solid waste (MSW) from Southern California Counties. This MSW would be delivered to the site by rail. If the regional landfill is used for disposing of MSW from Imperial County, the material would be transported to the siting using transfer trucks from transfer stations. At a maximum, it is anticipated that the volume of locally generated MSW would result in 12 to 20 daily transfer truck trips to and from the proposed landfill.

The project itself would not normally require any essential public services to support its operations, though police and health care facilities could potentially be called upon in unusual emergencies.

It is likely that the rail haul route would contain several at grade crossings. The term "at-grade crossing" refers to any location where a rail line crosses a roadway facility without a grade separation (i.e., over or underpass). While it is not anticipated that the proposed regional landfill would interfere with an emergency response plan or an emergency evacuation plan, the EIS/EIR will identify at-grade train crossings along the proposed haul route. The EIS/EIR will also evaluate the potential for conflicts between rail traffic and automobile/truck traffic, including emergency vehicles.

11. Population

The proposed project would not alter the location or distribution of the human population in the area. During peak activities, the landfill would require approximately 268 employees. The workforce would primarily be drawn from existing residents, including workers presently at the Mesquite Mine. Therefore, it is not anticipated that the proposed project would substantially alter the density or growth rate of the human population. The EIS/EIR will address the potential population impacts associated with the proposed Mesquite Regional Landfill.

12. Housing

The proposed project will not affect existing housing. The landfill would be located at least three miles from the nearest permanent residence. However, it is anticipated that approximately 268 persons would be employed for daily operations at the proposed landfill during peak activities. As previously discussed, he workforce would primarily be drawn from existing residents, including workers presently at the Mesquite Mine. Any increase in the demand for housing would be addressed in the EIS/EIR.

13. Transportation/Circulation

a. The proposed project would result in the generation of additional vehicular traffic. It is anticipated that landfill employee traffic would initially include approximately 60 trips/

day during the first year of operation. This traffic would increase to approximately 150 trips/day after the seventh year of operation. This traffic would be distributed among three landfill shifts. The increased landfill employee traffic would generally effect a reduction in existing Mesquite Gold Mine employee traffic as mining operations are discontinued during the next 10 to 15 years. If the regional landfill is used for disposing of MSW from Imperial County, the material would be transported to the site using transfer trucks from transfer stations. At a maximum, it is anticipated that the volume of locally generated MSW would result in 12 to 20 daily transfer truck trips to and from the proposed landfill.

b. The proposed project would result in an increase in the demand for new parking. Landfill employee and visitor parking areas would be provided at the site.

c, d. Access to the proposed landfill would require modifications to the existing Mesquite Mine access road and an additional intersection at Highway 78. The proposed project would also install a rail spur from the existing Southern Pacific main line, approximately one mile northwest of the Glamis Beach Store, to the landfill site.

Though these changes will have an impact on existing transportation systems, this impact is not expected to be substantial. Alternations to patterns of circulation or movement of people and/or goods would result from daily deliveries to the landfill of goods from vendors.

e. The proposed Mesquite Regional Landfill would result in an alteration of train traffic. The MSW would be transported to the proposed Mesquite Regional Landfill by railroad, in specially designed enclosed containers. This would increase the number of trains presently utilizing the Southern Pacific main line.

f. The increased vehicle traffic associated with the proposed landfill operations could result in a statistical increase in traffic hazards to motor vehicles. Employee training and security measures are expected to minimize the actual occurrence of traffic hazards in the area.

The EIS/EIR will address the potential transportation and circulation impacts associated with the proposed Mesquite Regional Landfill.

14. Public Services

a, b. The landfill facility would be secured and equipped so that outside police or fire-fighting resources would not be needed, although police protection would potentially be called upon in unusual emergencies.

c. It is anticipated that the project would not have a significant impact on the population of Imperial County. However, during peak activities, landfill operations would require approximately 268 employees. The work force would be drawn primarily from existing residents, including workers presently at the Mesquite Mine. Therefore, it is not anticipated that there would be a significant increase in the number of children attending local schools. The EIS/EIR will address the potential for significant impacts to local schools.

d. The location of the proposed landfill and rail spur have been selected such that it would not affect existing off-road vehicular recreational activities. The landfill would be located at least three miles from the nearest residence, and seven miles from the Imperial Sand Dunes Recreational Area.

e. The landfill would generate substantial fees and taxes for the county, which could help pay for area services and potentially improve local infrastructure. Access to the proposed landfill would require an additional intersection at Highway 78 and the existing Mesquite Mine access road.

f. The potential for the proposed project to have an effect upon, or result in a need for other governmental services will be analyzed in the EIS/EIR.

15. Energy

a, b. Energy consumption requirements for the project site would be calculated and compared to net energy consumption for other solid waste disposal methods, such as waste to energy plants and smaller landfill facilities in Los Angeles and other Southern California Counties. A discussion will be included in the EIS/EIR.

It is expected that the landfill will generate landfill gas. This gas can be captured and used to create electricity or replace other fuels.

16. Utilities

a. Electricity would be the primary source of power for landfill operations. Most power usage would be for pumping of water, operation of the landfill gas control system, and nighttime lighting in the intermodal area and along the road to and at the landfill working face. Other operations and maintenance activities would require minor amounts of electricity. Electrical power needs for the landfill would be obtained from the existing IID 92kV power line and substation at the Mesquite Mine. An extension from the existing IID line would be built to an additional substation located near the intermodal facilities. A right-of-way may be required from the BLM to construct this extension. Standby generators fueled by landfill gas, methane, or imported fuel such as diesel, would be available to provide power for essential facilities in the event of power outages. There would be the potential to generate power on-site in the future, if an energy recovery system was constructed to use landfill gas from the landfill.

b. The necessity for new communications systems or substantial alterations to existing systems will be discussed in the EIS/EIR.

c. Water would be obtained from the existing Gold Fields well field located approximately three miles south of the project area. Initial calculations indicate that the combination of Mesquite Mine and landfill water usages would not exceed the existing maximum permitted amount for annual well field withdrawal (maximum permitted rate = 4,033 gpm).

d. Sanitation would be handled in the same manner as at the Mesquite Mine. One or more septic tanks and leach fields would be installed. The septic tanks would be pumped periodically to keep the system biologically active and in good working condition. The pumped materials would be transported off-site to an appropriate disposal facility.

e. Stormwater drainage flows would be altered in the immediate project area and returned, where possible, to existing natural drainage patterns. The drainage control facilities to be incorporated into the design of the proposed landfill will be discussed in the EIS/EIR.

f. Very little waste would be generated by the proposed project. These small volumes would be handled by the following procedures:

- Typical Class III wastes would be disposed in the landfill along with other arriving municipal solid waste.
- Waste oils, solvents, oil filters, etc., would be recycled through licensed off-site recyclers, if possible.
- Hazardous wastes, if any, would be transported off-site in accordance with applicable state and federal laws, to an approved disposal facility.

Used tires would be disposed within the landfill in accordance with applicable laws.

The need for any utility improvements associated with the project site and impacts to existing utilities will be evaluated and discussed in the EIS/EIR.

17. Human Health

a, b. The sources of potential health and safety impacts include toxic air contaminants in landfill gas and train-related hazards at unprotected railroad crossings. The proposed landfill would not receive hazardous wastes. Hazardous wastes would be removed at Material Recovery Facilities located in the trash-generating communities. Landfill equipment operators and spotters at the working face would be trained to identify and handle potential volumes of hazardous wastes that may be present in the materials as they are deposited. Any hazardous wastes that are identified would be removed from the landfill working area, stored in a specially contained area, characterized and transferred off-site in accordance with applicable state and federal laws to an approved hazardous waste disposal facility.

Certain solvents and recyclable oils would be used in connection with equipment maintenance and cleaning. These materials would be stored in on-site containment areas until they are transported to licensed off-site recyclers. If these materials are not reused on-site in accordance with applicable state and federal regulations, they would be transported off-site to an approved recycler or disposal facility.

No explosives would be used in connection with this project.

The proposed landfill site was determined to be an ideal landfill site because of various site characteristics that would minimize the potential creation of health hazards. The following are among the special site-specific advantages in limiting potential health hazards:

- The arid climate (2 to 3 inches of rain per year) makes the likelihood of landfill leachate development very low.

- Lack of surface water resources and the fact that the depth to groundwater (100 to 300 feet in the project area) is well in excess of state regulatory requirements.

- Surface water runoff from the site occurs infrequently and does not drain to any streams or surface water bodies.

- The isolated location would also minimize the effects of noise or vibrations generated by daily landfill operations activities.

In addition to careful selection of the site, a number of special environmental monitoring and control procedures have been designed to allow landfill operators to monitor and control potential human health hazards. These monitoring and control procedures include:

- A low permeability composite liner and leachate control system would be constructed prior to placement of MSW. The liner and leachate control system would be modified as time passes, if appropriate, to suit technology advances, site experiences, and/or changed regulations.

- Landfill development would be performed in ways to minimize birds and vectors, odors, windblown debris, and water infiltration from occasional desert rainfalls. MSW would be spread into cells, compacted with heavy equipment, and covered (daily cover) to keep the exposed open face as small as practical.

- A landfill gas collection and monitoring system (including the base liner) would be installed to collect the majority of landfill gas to minimize volatile conditions in and around the landfill, and avoid potential contamination of the atmosphere and/or groundwater.

An environmental health and public safety technical report will be prepared as part of this EIS/EIR.

18. Aesthetics

The proposed landfill site area is characterized by relatively flat terrain with a series of parallel drainage channels, separated by slightly elevated desert pavement areas. The backdrop of the Chocolate Mountains provides the greatest topographic variation within the area. Several local hills extending to heights up to 400 feet above the wash, the Mesquite Mine overburden stockpile, and ore processing heap leach piles are presently the most dominant topographic features in the immediate area.

Visual impacts of mine operations were mitigated by relocation of Highway 78 to the south of the operation in 1988. Construction and operation of a landfill on this site would result in the elimination and/or reduction in size of many of the mine waste piles. These would be replaced by a single large landform. Landfill height would vary between approximately 375 and 475 feet above the wash, varying from a 3:1 slope at the bottom, to 5:1 near the top. The variable heights would allow the landfill to be designed to better blend into the background topography, reducing the "man-made" appearance of straight lines and corners on the top of the landfill.

The EIS/EIR will assess the impacts of the proposed landfill site on the visual character of the surrounding area. The existing visual characteristics of the candidate site will be described and areas from which the landfill would be visible will be identified. Particular attention will be paid to the height of the fill and its visual impact on surrounding areas. A visual/aesthetics technical report will be prepared as part of the EIS/EIR. Visual modeling will be used to assess potential impacts that would result from project implementation.

19. Recreation

The location of the landfill has been selected such that it would not affect existing off-road vehicular recreational activities. The landfill would be located at least three miles from the nearest residence, and seven miles from the Imperial Sand Dunes Recreational Area.

20. Cultural Resources

a, c, d. A complete archaeological inventory of the proposed landfill site has identified an old wagon trail as the only significant archaeological, prehistorical, or historical site that would be impacted by the project. A program of data recovery would be implemented to mitigate this impact. The project would not cause any physical change which would affect ethic cultural values. Nor would the project restrict existing religious or sacred uses within the potential impact area.

b. The EIS/EIR for the proposed Mesquite Landfill will identify any paleontological resources in the project area and potential project-related impacts.

IVC BARKER MUSEUM

RECEIVED

MAY 12 1992

IMPERIAL COUNTY
PLANNING DEPARTMENT

11 May 1992

Kent Hector, Planner II
Imperial County Planning Department
939 Main Street
El Centro, CA 92243

Re: Notice of Preparation (NOP) for Class III Facility
Mesquite Regional Landfill/Arid Operations, Inc.

Dear Mr. Hector:

Pursuant to the Notice of Preparation (NOP) for the above stipulated project, IVC Museum wishes to respond at this time.

As Gold Fields Mesquite Mine is in operation at the time this NOP was originated, IVC Museum expresses no concerns as to the placement of the Class III Mesquite Regional Landfill/Arid Operations, Inc. upon Gold Fields property.

However, if any lands, other than the mine itself, or any adjoining lands are to be impacted by the above described project, a physical archaeological survey should be conducted.

However, as stipulated within the NOP, a railroad spur heading and connecting railroad spur lines will be constructed, from the Southern Pacific Railroad, near Glamis, California, which will provide railroad spur service to the above described operation and project.

As the possibility exists that the placement of this railroad heading and connecting spur line will impact archaeological sites of record, it is recommended that a physical archaeological survey be conducted prior to any impaction of lands which may have archaeological sites of record during the construction of the railroad heading and spur line.

IMPERIAL VALLEY COLLEGE MUSEUM 442 MAIN STREET EL CENTRO, CA 92243 (619) 352-1667

If you or any other person expresses any concerns regarding this letter, please feel free to contact IVC Museum staff at any time.

If staff of IVC Museum can be of further assistance, please do not hesitate to call or write.

Sincerely,

Ray Wilcox

Ray Wilcox
Site Recorder,
IVC Museum

DEPARTMENT OF DEFENSE
UNITED STATES OF AMERICA

UNITED STATES MARINE CORPS
U.S. MARINE CORPS AIR STATION
YUMA, ARIZONA 85369-5001

IN REPLY REFER TO:
11000
3AQ
18 MAY 1992

Mr. Jurg Heuberger
Planning Director
Imperial County Planning Department
939 Main Street
El Centro, California 92243-2856

Dear Mr. Heuberger:

The Imperial County change of zone application, comprehensive general plan amendment and conditional use permit application for the Mesquite Regional Landfill has been reviewed by this Command. There are certain areas of concern I would like to bring to your attention.

Access to the Chocolate Mountains Aerial Gunnery Range (CMAGR) will be impacted by any of the proposed railroad spurs. The attached map shows the approximate location of the two existing roads utilized by Marines to enter the southern portion of the CMAGR. Crossings must be provided and maintained at both sites at no expense to the Government and the crossings cannot be blocked by trains waiting to be unloaded. The military must insist on free unencumbered access to the CMAGR.

Additionally; there are some specific comments I would like to make:

a. Page 1-3, Paragraph 1-1. CMAGR is actively used by tactical aircraft devoted to live ordnance delivery.

b. Page 1-3, Paragraph 1-1. The Mesquite Mine Area is in seismic zone 4.

c. Page 1-3, Paragraph 1-1. Annual rainfall is small but comes in short time intervals producing high erosion rates.

d. Page 4-11, Paragraph 4.3.4. Minimizing the attraction of birds and windblown debris and water infiltration onto the CMAGR is of prime concern to the Marine Corps.

e. Page 5-2, Paragraph 5.2.2. Has the NO_x generated in Mexico and blown north been considered?

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MAY 22 1992
IMPERIAL COUNTY
PLANNING DEPARTMENT

I thank you for giving us the opportunity to review and comment on the proposal. Any future correspondence concerning the Arid Operations, Inc. landfill should be addressed to my Community Plans and Liaison Office (Code 3AQ).

Sincerely,

C. B. CHEATHAM
Colonel, U.S. Marine Corps
Commanding Officer

Encl:
(1) Site Map

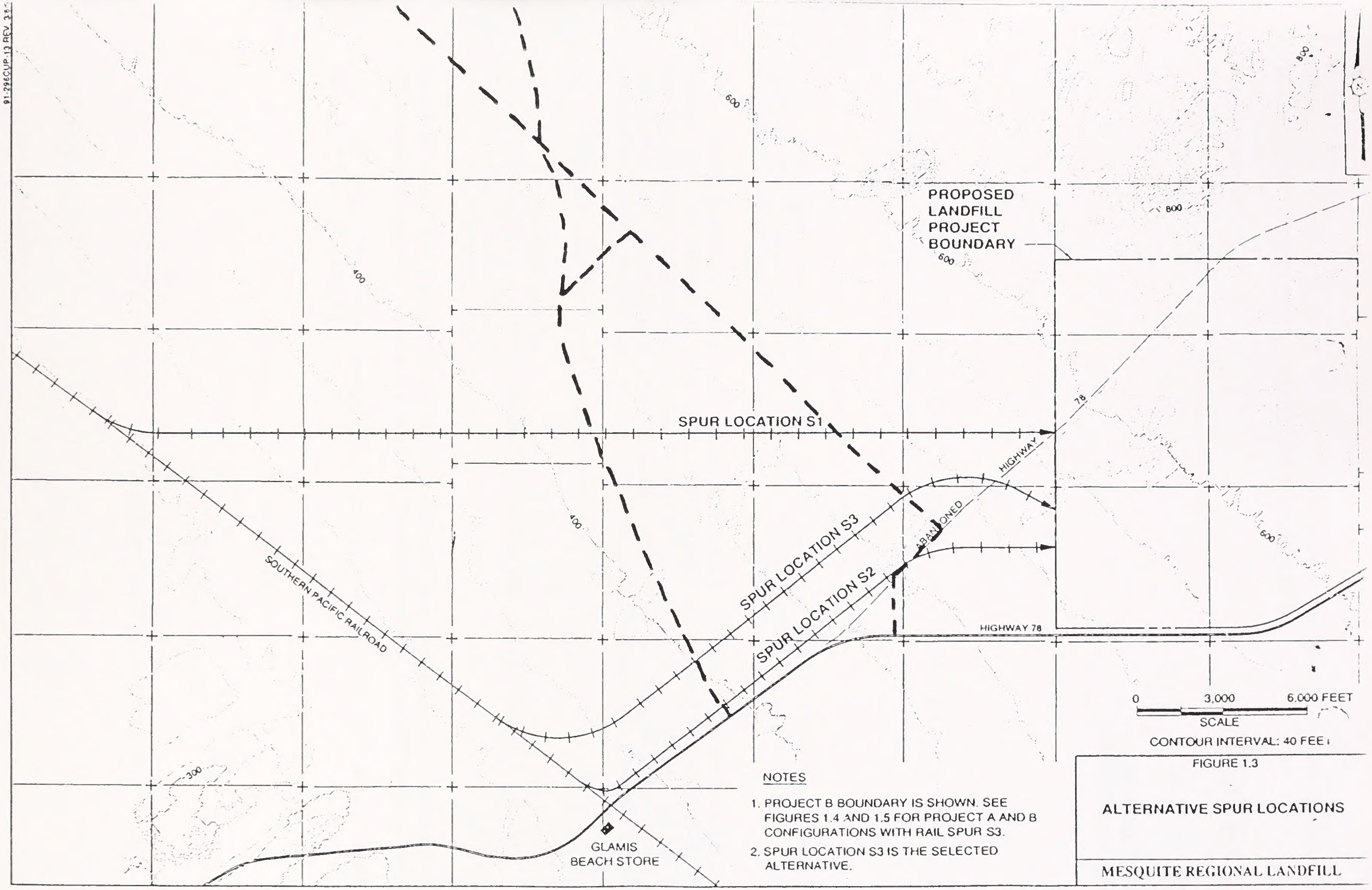

FIGURE 1.3

ALTERNATIVE SPUR LOCATIONS

MESQUITE REGIONAL LANDFILL

NOTES

1. PROJECT B BOUNDARY IS SHOWN. SEE FIGURES 1.4 AND 1.5 FOR PROJECT A AND B CONFIGURATIONS WITH RAIL SPUR S3.
2. SPUR LOCATION S3 IS THE SELECTED ALTERNATIVE.

EXISTING ROADS – – –

ENCLOSURE(1)

STATE OF CALIFORNIA PETE WILSON, *Governor*

GOVERNOR'S OFFICE OF PLANNING AND RESEARCH
1400 TENTH STREET
SACRAMENTO, CA 95814

RECEIVED

MAY 20 1992

IMPERIAL COUNTY
PLANNING DEPARTMENT

DATE: May 18, 1992

TO: Reviewing Agency

RE: IMPERIAL COUNTY PLANNING/BUILDING DEPARTMENT's NOP for
MESQUITE REGIONAL LANDFILL
SCH # 92051024

Attached for your comment is the IMPERIAL COUNTY PLANNING/BUILDING DEPA Notice of Preparation of a draft Environmental Impact Report (EIR) for the MESQUITE REGIONAL LANDFILL.

Responsible agencies must transmit their concerns and comments on the scope and content of the EIR, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of this notice. We encourage commenting agencies to respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

JURG HUEBERGER
IMPERIAL COUNTY PLANNING/BUILDING DEPARTMENT
939 MAIN STREET
EL CENTRO, CA 92243

with a copy to the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the review process, call Tom Loftus at (916) 445-0613.

Sincerely,

Christine Kinne

Christine Kinne
Acting Deputy Director, Permit Assistance

Attachments

cc: Lead Agency

NOP Distribution List

SCH# 92051024

S = sent by lead agency
X = sent by SCH

Resources Agency

☐ Judy Carpenter
Dept. of Boating & Waterways
1629 S Street
Sacramento, CA 95814
916/445-6281

☐ Gary L. Holloway
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105-2219
415/904-5200

☐ Reed Holderman
State Coastal Conservancy
1330 Broadway, Suite 1100
Oakland, CA 94612
510/464-1015

☒ Steve Oliva
Dept. of Conservation
1416 Ninth Street, Room 1326-2
Sacramento, CA 95814
916/445-8733

○ Div. of Mines and Geology
○ Div. of Oil and Gas
○ Land Resources Protect. Unit

☐ Douglas Wickizer
Dept. of Forestry
1416 Ninth Street, Room 1516-2
Sacramento, CA 95814
916/653-9451

☐ Hans Kreutzberg
Office of Historic Preservation
P.O. Box 942896
Sacramento, CA 94296-0001
916/653-9107

☒ Mike Doyle
Dept. of Parks and Recreation
P.O. Box 942896
Sacramento, CA 94296-0001
916/653-0547

☒ Anna Leena Bronson
Reclamation Board
1416 Ninth Street Room 706
Sacramento, CA 95814
916/653-9669

☐ Nancy Wakeman
S.F. Bay Conservation & Dev't Comm.
30 Van Ness Avenue, Room 2011
San Francisco, CA 94102
415/557-3686

☐ Nadell Gayou
Dept. of Water Resources
1416 Ninth Street, Room 449
Sacramento, CA 95814
916/653-6866

Fish and Game - *Regional Offices*

☐ Gary Stacey, Regional Manager
Department of Fish and Game
601 Locust
Redding, CA 96001
916/225-2300 (8-442)

☐ Jim Messersmith, Regional Manager
Department of Fish & Game
1701 Nimbus Road, Suite A
Rancho Cordova, CA 95670
916/355-0922 (8-438)

☐ B. Hunter, Regional Manager
Department of Fish and Game
P.O. Box 47
Yountville, CA 94599
707/944-5518

☐ G. Nokes, Regional Manager
Department of Fish and Game
1234 East Shaw Avenue
Fresno, CA 93710
209/222-3761 (8-421)

☒ Fred A. Worthley, Jr., Reg. Manager
Department of Fish and Game
330 Golden Shore, Suite 50
Long Beach, CA 90802
213/590-5113 (8-635)

Independent Commissions

☐ John R. Nuffer
California Energy Commission
1516 Ninth Street, MS-15
Sacramento, CA 95814
916/654-3859

☒ William A. Johnson
Native American Heritage Comm.
915 Capitol Mall, Room 288
Sacramento, CA 95814
916/653-4082

☒ William Meyer
Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
415/703-1540 (8-597)

☒ Betty Eubanks
State Lands Commission
1807 - 13th Street
Sacramento, CA 95814
916/322-2795

Business, Transportation, & Housing

☐ Sandy Hesnard
Caltrans - Division of Aeronautics
P.O. Box 942874
Sacramento, CA 94274-0001
916/324-1833

☒ Tom Micone
California Highway Patrol
Office of Special Projects
Planning and Analysis Division
2555 First Avenue
Sacramento, CA 95818
916/437-7222

☒ Ron Helgason
Caltrans - Planning

Department of Transportation *District Contacts*

☐ Guy Luther
Caltrans, *District 1*
1656 Union Street
Eureka, CA 95501
707/445-6407

☐ Michelle Gallagher
Caltrans, *District 2*
P.O. Box 494040
Redding, CA 96049-4040
916/225-3259 (8-442)

☐ Jody Lonergan
Caltrans, *District 3*
703 B Street
Marysville, CA 95901
916/741-4277 (8-457)

☐ Gary S. Adams
Caltrans, *District 4*
P.O. Box 7310
San Francisco, CA 94120
415/557-9162 (8-597)

☐ Wayne Schnell
Caltrans, *District 5*
P.O. Box 8114
San Luis Obispo, CA 93403-8114
805/549-3683 (8-629)

☐ Moses Pacheco
Caltrans, *District 6*
P.O. Box 12616
Fresno, CA 93778
209/276-5989 (8-422)

☐ Gary McSweeney
Caltrans, *District 7*
120 South Spring Street
Los Angeles, CA 90012
213/620-2376 (8-640)

☐ Harvey Sawyer
Caltrans, *District 8*
P.O. Box 231
San Bernardino, CA 92402
714/383-4808 (8-670)

☐ Lisa Flores
Caltrans, *District 9*
500 South Main Street
Bishop, CA 93514
619/872-0203 (8-627)

☐ Al Johnson
Caltrans, *District 10*
P.O. Box 2048
Stockton, CA 95201
209/948-7838 (8-423)

☒ Mike Owen
Caltrans, *District 11*
P.O. Box 85406
2829 Juan Street
San Diego, CA 92186-5406
619/688-6750 (8-631)

☐ Aileen Kennedy
Caltrans, *District 12*
2501 Pullman St.
Santa Ana, CA 92705
714/724-2239 (8-655)

Food and Agriculture

☐ Vashek Cervinka
Dept. of Food and Agriculture
1220 N Street
Sacramento, CA 95814
916/322-5227

Health & Welfare

☒ Quy Tu
Dept. of Health
714 P Street, Room 692
Sacramento, CA 95814
916/323-6111

☐ DHSTSCD: __________

State and Consumer Services

☐ Robert Sleppy
Dept. of General Services
400 P Street, Suite 5100
Sacramento, CA 95814
916/324-0214

Environmental Affairs

☒ Barbara Fry
Air Resources Board
1102 Q Street
Sacramento, CA 95814
916/322-8267

☒ Steve Ali
Calif. Waste Management Board
8800 Cal Center Drive
Sacramento, CA 95826
916/322-4215

State Water Resources Control Board

☐ Allan Patton
State Water Resources Control Board
Division of Clean Water Programs
P.O. Box 944212
Sacramento, CA 94244-2120
916/739-4265

☐ Dave Berringer
State Water Resources Control Board
Delta Unit
P.O. Box 2000
Sacramento, CA 95812-2000
916/322-9870

☒ Phil Zentner
State Water Resources Control Board
Division of Water Quality
P.O. Box 100
Sacramento, CA 95801
916/657 0912

☐ Mike Falkenstein
State Water Resources Control Board
Division of Water Rights
901 P Street, 3rd Floor
Sacramento, CA 95814
916/657-1377 (8-437)

☒ APCD/AQMD: IMPERIAL

Regional Water Quality Control Board

☐ NORTH COAST REGION (1)
1440 Guerneville Rd.
Santa Rosa, CA 95401
707/576-2220 (8-590)

☐ SAN FRANCISCO BAY REGION (2)
2101 Webster, Suite 500
Oakland, CA 94612
415/464-1255 (8-561)

☐ CENTRAL COAST REGION (3)
81 Higuera Street, Suite 200
San Luis Obispo, CA 93401-5414
805/549-3147 (8-629)

☐ LOS ANGELES REGION (4)
1075 S. Broadway, Rm. 4027
Los Angeles, CA 90012
213/266-4460 (8-640)

☐ CENTRAL VALLEY REGION (5)
3443 Routier Road, Suite A
Sacramento, CA 95827-3098
916/361-5600

○ Fresno Branch Office
3614 East Ashlan Avenue
Fresno, CA 93726
209/445-5116 (8-421)

○ Redding Branch Office
415 Knollcrest Drive
Redding, CA 96002
916/224-4845 (ATS 441)

☐ LAHONTAN REGION (6)
2092 Lake Tahoe Boulevard
South Lake Tahoe, CA 96150
916/544-3481

○ Victorville Branch Office
15428 Civic Drive, Suite 100
Victorville, CA 92392-2359
619/241-6583

☒ COLORADO RIVER BASIN REGION (7)
73-271 Highway 111, Suite 21
Palm Desert, CA 92260
619/346-7491

☐ SANTA ANA REGION (8)
2010 Iowa Avenue, Suite 100
Riverside, CA 92507
714/782-4130 (8-632)

☐ SAN DIEGO REGION (9)
9771 Clairemont Mesa Blvd., Suite B
San Diego, CA 92124-1331
619/265-5114 (8-636)

☒ OTHER: COLORADO RIVER BOARD

☐ OTHER: __________

STATE OF CALIFORNIA—THE RESOURCES AGENCY
PETE WILSON, *Governor*

DEPARTMENT OF FISH AND GAME
330 Golden Shore, Suite 50
Long Beach, California 90802
(310) 590-5113

May 19, 1992

Mr. Jurg Heuberger
Imperial County Planning Department
938 Main Street
El Centro, California 92243-2856

Dear Mr. Heuberger:

Notice of Preparation for Class III Facility Mesquite Regional Landfill/Arid Operations, Inc., Riverside County

To enable our staff to adequately review and comment on subject project, we recommend the following information be included in the Draft Environmental Impact Report:

1. A complete assessment of flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened and locally unique species and sensitive and critical habitats.

2. A discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts.

3. A discussion of potential adverse impacts from any increased runoff, sedimentation, soil erosion, and/or urban pollutants on streams and watercourses on or near the project site, with mitigation measures proposed to alleviate such impacts. Stream buffer areas and maintenance in their natural condition through non-structural flood control methods should also be considered in order to continue their high value as wildlife corridors.

4. Since the proposed project lies within the historic range of the State-listed threatened Mojave ground squirrel, an endangered species consultation with the Department will be necessary. The Cumulative Human Impact Evaluation required for the project site combined with information on any other impacted liste species must be provided to the Department. This information will be utilized to draft an endangered species management permit, if warranted. The permit must be completed and mitigation measures fully dedicated before project initiation.

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PLANNING DEPARTMENT

> More generally, there should be discussion of alternatives to not only minimize adverse impacts to wildlife, but to include direct benefit to wildlife and wildlife habitat. Those discussions should consider the Department of Fish and Game's policy that there should be no net loss of wetland acreage or habitat values. We oppose projects which do not provide adequate mitigation for such losses.

Diversion, obstruction of the natural flow, or changes in the bed, channel, or bank of any river, stream, or lake will require notification to the Department of Fish and Game as called for in the Fish and Game Code. Notification should be made after the project is approved by the lead agency.

Thank you for the opportunity to review and comment on this project. If you have any questions, please contact Ms. Kim McKee at (310) 590-5137.

Sincerely,

R. E. Mall for
Fred Worthley
Regional Manager
Region 5

cc: Office of Planning & Research

SCAG
SOUTHERN CALIFORNIA
ASSOCIATION OF GOVERNMENTS
818 West Seventh Street,12th Floor • Los Angeles, California 90017-3435 ☐ (213) 236-1800 • FAX (213) 236-1825

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Diann Ring, *Mayor Pro Tem*
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May 21, 1992

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MAY 22 1992

IMPERIAL COUNTY
PLANNING DEPARTMENT

Jurg Heuberger
Planning Director
Imperial County Planning Department
939 Main Street
El Centro, CA 92243

RE: Notice of Preparation for Class III Facility of Mesquite Regional Landfill/Arid Operations, Inc.
SCAG Clearinghouse #: IM-55713-NPR

Dear Mr. Heuberger:

We have reviewed the above referenced document and determined that it is not regionally significant per Areawide Clearinghouse criteria. Therefore, the project does not warrant clearinghouse comments at this time. Should there be a change in the scope of the project, we would appreciate the opportunity to review and comment at that time.

A description of the project will be published in the June 1, 1992 Intergovernmental Review Report for public review and comment.

The project title and SCAG number should be used in all correspondence with SCAG concerning this project. Correspondence should be sent to the attention of the Clearinghouse Coordinator. If you have any questions, please contact Michael Ouelett at (213) 236-1886.

Sincerely,

Eric H. Roth

ERIC H. ROTH
Manager, Intergovernmental Review

ALTERNATES

Imperial County o **Sam Sharp,** *Supervisor* • Los Angeles County o **Ed Edelman,** *Supervisor* and **Kenneth Hahn,** *Supervisor* • Orange County o **Gaddi Vasquez,** *Supervisor* • Riverside County o **Melba Dunlap,** *Supervisor* • San Bernardino County o **Larry Walker,** *Supervisor* • Ventura County o **Vicky Howard,** *Supervisor* • Cities of Imperial County o **Victor Sanchez, Jr.,** *Mayor Pro Tem,* Westmorland • Cities of Los Angeles County o **Abbe Land,** *Councilmember,* West Hollywood • Cities of Orange County o **Ruthelyn Plummer,** *Councilmember,* Newport Beach • Cities of Riverside County o **(Vacant)** • Cities of San Bernardino County o **Elmer Digneo,** *Mayor Pro Tem,* Loma Linda • Cities of Ventura County o **Judy Mikels,** *Councilmember,* Simi Valley • City of Los Angeles o **Richard Alatorre,** *Councilmember* o **Rita Walters,** *Councilmember* o **Michael Woo,** *Councilmember* • Long Beach 2nd position o **Douglas Drummond,** *Councilmember* • At Large o **George Nakano,** *Councilmember,* Torrance o **Candace Haggard,** *Councilmember,* San Clemente o **Judy Wright,** *Councilmember,* Claremont • Ex-Officio o **Judith Johnston-Weston,** Los Angeles; *Chair,* Regional Advisory Council

IMPERIAL IRRIGATION DISTRICT

OPERATING HEADQUARTERS • P. O. BOX 937 • IMPERIAL, CALIFORNIA 92251

AGM

May 22, 1992

Mr. Jurg Heuberger
Planning Director
County of Imperial
939 Main Street
El Centro, CA 92243-2856

Dear Mr. Heuberger:

Subject: Notice of Preparation (NOP) for Class III Facility,
Mesquite Regional Landfill/Arid Operations, Inc.

Your letter of May 5, 1992 enclosed the subject notice which requested a response and identification of a contact person. This proposed facility is located adjacent to Highway 78 at the Gold Fields Mesquite Mine site.

Groundwater is identified as the source of water for the facility and; therefore, there does not appear to be any impact on Water Department facilities.

Because of the preliminary nature of this proposal, the impacts on the Power Department cannot be determined. However, the project's sponsors must make direct contact with the Power Department as early in the process as possible. This facility could have a significant impact on the power generation and transmission facilities of the Imperial Irrigation District (IID).

Contact person for the IID is Mr. Henry Legaspi, Power Department Manager, (619) 339-9225. We would appreciate receiving pages 1 and 2 of the environmental checklist which were not included.

Thank you for the opportunity to respond to this notice.

Sincerely,

Charles L Shreves
CHARLES L. SHREVES
General Manager

a:mesquite.let
RAM:djb

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MAY 28 1992

IMPERIAL COUNTY
PLANNING DEPARTMENT

March 3, 1849

United States Department of the Interior

FISH AND WILDLIFE SERVICE

Salton Sea National Wildlife Refuge
P.O. Box 120
Calipatria, CA 92233-0120

May 26, 1992

Imperial County Planning Department
Jurg Heuberger, Planning Director
939 Main Street
El Centro, CA 92243-2856

Dear Mr. Heuberger,

Our refuge office in Calipatria has recently received numerous documents from the Planning Department relating to developments in Imperial County. In addition to the U.S. Fish and Wildlife Service, Salton Sea National Wildlife Refuge office in Calipatria, we are requesting that the U.S. Fish and Wildlife Service Enhancement Field Office be added to your mailing list for documents that require environmental review, if this is not already established. This division of the U.S. Fish and Wildlife Service is responsible for environmental review of documents involving NEPA and CEQA. Their complete address is:

U.S. Fish and Wildlife Service
Enhancement Field Office
Mr. Jack Fancher, Supervisory Fish and Wildlife Biologist
2730 Loker Avenue West
Carlsbad, CA 92008

Your assistance in this matter will be greatly appreciated.

Sincerely,
Marcia F. Radke
Marcia F. Radke
Wildlife Biologist

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JUN 03 1992
IMPERIAL COUNTY
PLANNING DEPARTMENT

United States Department of the Interior

FISH AND WILDLIFE SERVICE

Salton Sea National Wildlife Refuge
P.O. Box 120
Calipatria, CA 92233-0120

June 2, 1992

Imperial County Planning Department
Jurg Heuberger, Planning Director
939 Main Street
El Centro, CA 92243-2856

Subject: Mesquite Regional Landfill/Arid Operations, Inc.

Dear Mr. Heuberger,

Enclosed below are comments on the notice of preparation for the Mesquite Regional Landfill/Arid Operations, Inc. Concerns include recycling activites which should perhaps be a consideration in the project. A major concern regarding this proposal includes the additional impact of wildlife habitat which occurs at the landfill site, and the occurrence of the federally and state threatened desert tortoise in this area. Therefore, a copy of the notice of preparation for the Mesquite Regional Landfill/Arid Operations has been forwarded to the U.S. Fish and Wildlife Service Enhancement Field Office in Carlsbad for any possible formal consultation required.

Please contact me at (619) 348-5278 if you require further information.

Sincerely,

Marcia F. Radke

Marcia F. Radke
Wildlife Biologist

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JUN 03 1992

IMPERIAL COUNTY
PLANNING DEPARTMENT

STATE OF CALIFORNIA—THE RESOURCES AGENCY

PETE WILSON, *Governor*

DEPARTMENT OF FISH AND GAME
330 Golden Shore, Suite 50
Long Beach, California 90802
(310) 590-5113

RECEIVED
JUL 13 1992
[illegible] GROUP

June 4, 1992

Mr. Jurg Hueberger
Imperial County Planning/Building Department
939 Main Street
El Centro, California 92243

Dear Mr. Hueberger:

Notice of Preparation for Mesquite Regional Landfill
Imperial County - SCH 92051024

To enable our staff to adequately review and comment on subject project, we recommend the following information be included in the Draft Environmental Impact Report:

1. A complete assessment of flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened and locally unique species and sensitive and critical habitats.

2. A discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts.

3. A discussion of potential adverse impacts from any increased runoff, sedimentation, soil erosion, and/or urban pollutants on streams and watercourses on or near the project site, with mitigation measures proposed to alleviate such impacts. Stream buffer areas and maintenance in their natural condition through non-structural flood control methods should also be considered in order to continue their high value as wildlife corridors.

    More generally, there should be discussion of alternatives to not only minimize adverse impacts to wildlife, but to include direct benefit to wildlife and wildlife habitat. Those discussions should consider the Department of Fish and Game's policy that there should be no net loss of wetland acreage or habitat values. We oppose projects which do not provide adequate mitigation for such losses.

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PLANNING DEPARTMENT

Diversion, obstruction of the natural flow, or changes in the bed, channel, or bank of any river, stream, or lake will require notification to the Department of Fish and Game as called for in the Fish and Game Code. Notification should be made after the project is approved by the lead agency.

Thank you for the opportunity to review and comment on this project. If you have any questions, please contact Ms. Kim McKee at (310) 590-5137.

Sincerely,

Fred Worthley
Regional Manager
Region 5

cc: Office of Planning & Research

150 SOUTH NINTH STREET
EL CENTRO, CA. 92243-2850

TELEPHONE: (619) 339-4606
FAX: (619) 353-9420

AIR POLLUTION CONTROL DISTRICT

June 4, 1992

Mr. Jurg Heuberger
Imperial County
Planning/Building Department

Dear Mr. Heuberger:

We have reviewed the Imperial County's Planning/Building Department Notice of Preparation (NOP) of a draft Environmental Impact Report (EIR) for the Mesquite Regional Landfill. The NOP states that the proposed project may result in adverse impacts on air quality. To enable adequate analysis of potential air quality impacts, we recommend that the EIR contain the following information.

1. A description of the facility including:

    a. Types and quantities of waste to be handled;
    b. Technical information on the proposed diversion and recovery programs, loading and disposal operation.
    c. Capacity and acceptance rate for the landfill;
    d. Schedule of operation, and expected date of start-up.

2. A description of the existing environmental setting at the proposed project site and adjacent areas including:

    a. Location;
    b. Meteorology and topography;
    c. Current background and onsite air quality, including information on ambient air concentrations of criteria and noncriteria pollutants;
    d. Population distribution and the proximity of sensitive populations (e.g., residential areas, schools hospitals);
    e. Existing sources of air pollution in the vicinity of the proposed project.

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JUN 05 1992

IMPERIAL COUNTY
PLANNING DEPARTMENT

3. An analysis of the potential air quality impacts due to proposed project activities including:

   a. Construction of the project;
   b. Vehicular traffic, and
   c. Operation of the landfill, including the landfill gas collection/control system.

This analysis should include both criteria air pollutants for which ambient air quality standards exist and noncriteria air pollutants from the landfill. The analysis should also include estimates of average and highest controlled and uncontrolled emission rates of criteria and noncriteria air pollutants, and the basis for the assumptions and calculations used to determine these estimates.

4. An analysis of potential public exposure from the emission of noncriteria air pollutants.

5 A description of mitigation measures to minimize emissions. This discussion should include control equipment, process control, and other technical measures to reduce emissions of criteria and noncriteria air pollutants.

6. A description of similar emission sources proposed in California and the control requirements applicable to these sources.

7. Identification and description of all applicable federal, state, and local air pollution control regulations, and measures to comply with these regulations.

8. A description of alternatives to the proposed project and associated emissions of these alternatives.

We hope that a thorough discussion of the items listed in this letter will provide a better understanding of the air quality aspects of the proposed project and contribute to an effective EIR process. If you have questions regarding our comments, please contact Gaspar Torres or Harry Dillon at 339-4606.

Sincerely,

Miguel A Monroy

Stephen L. Birdsall
Air Quality Control Officer

STATE OF CALIFORNIA—THE RESOURCES AGENCY PETE WILSON, *Governor*

DEPARTMENT OF FISH AND GAME
330 Golden Shore, Suite 50
Long Beach, California 90802
(310) 590-5113

June 9, 1992

Mr. Jurg Heuberger
Imperial County Planning Department
939 Main Street
El Centro, California 92243

Dear Mr. Heuberger:

The Department has reviewed the Notice of Preparation for the Draft Environmental Impact Report (DEIR) for the Class III Facility Mesquite Regional Landfill in Imperial County. The project involves utilizing land primarily on the site of the existing Mesquite Mine for a regional landfill and the construction of a new railroad spur to the landfill from the existing Southern Pacific main line near Glamis.

The Department is concerned about the possible impacts of the landfill and railroad spur on resident desert tortoise populations and on the potential for the landfill to increase the numbers of ravens in the area. Ravens are a known predator on desert tortoises which are both state- and federally-listed as a threatened species.

The DEIR should include results of tortoise surveys make along the railroad route, as well as those at the proposed landfill site. Landfill operations should be designed to minimize raven attraction. Mitigation measures relating to raven population enhancement should be presented including, but not limited to, pre- and post-raven population monitoring and possible raven population reduction methods, if that should prove necessary.

Thank you for the opportunity to review this project. If you have additional questions, please contact Mr. Frank Hoover at the Chino Fish and Wildlife Base, (714) 597-8235.

Sincerely,

Fred Worthley

Fred Worthley
Regional Manager
Region 5

RECEIVED
JUN 15 1992
IMPERIAL COUNTY
PLANNING DEPARTMENT

cc: Mr. Frank Hoover, IF, R5
Mr. Rocky Thompson, WLM, R5

STATE OF CALIFORNIA—THE RESOURCES AGENCY

PETE WILSON, *Governor*

DEPARTMENT OF CONSERVATION
DIVISION OF ADMINISTRATION
DIVISION OF MINES AND GEOLOGY
DIVISION OF OIL AND GAS
DIVISION OF RECYCLING

801 K Street, MS 24-01
Sacramento, CA 95814-3500
Phone (916) 322-1080
(916) 445-8733

June 15, 1992

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IMPERIAL COUNTY
PLANNING DEPARTMENT

Mr. Jurg Hueberger
Imperial County Planning and Building Department
939 Main Street
El Centro, CA 92243

Mr. Hueberger:

Subject: Notice of Preparation (NOP) for the Draft Environmental Impact Report (DEIR) of the Mesquite Regional Landfill.

The Mined-Land Reclamation Project staff of the Department of Conservation's Division of Mines and Geology (DMG) has reviewed the information provided us regarding the proposed Mesquite Regional Landfill. An EIR is in the process of being completed. The following comments are for you consideration.

The proposed landfill project is located within the boundaries of the Mesquite Gold Mine and would use overburden material and ore residue for daily, intermediate, and final landfill cover. A portion of the project area overlaps existing Bureau of Land Management (BLM) gravel withdrawal areas. Useful surficial gravel occurs over about half of the project area. During construction of the rail spur and initial excavation of the landfill footprint, the plan proposes to remove economically recoverable gravel for use as aggregate.

The proposed landfill gravel extraction project would meet the criteria of "mined lands" under Section 2729 of the Surface Mining and Reclamation Act of 1975 (SMARA) (Public Resources Code Section 2710 et seq.):

> "Mined lands" includes the surface, subsurface, and ground water of an area in which surface mining operations will be, are being, or have been conducted, including private ways and roads appurtenant to any such area, land excavations, workings, mining waste, and areas in which structures, facilities, equipment, machines, tools, or other materials or property which result from, or are used in, surface mining operations are located.

Section 2735 of the Surface Mining and Reclamation Act defines surface mining operations as follows:

> "Surface mining operations" means all, or any part of, the process involved in the mining of minerals on mined

lands by removing overburden and mining directly from the mineral deposition, open-pit mining of minerals naturally exposed, mining by the auger method, dredging and quarrying, or surface work incident to an underground mine. Surface mining operations shall include, but are not limited to:

(a) Inplace distillation or retorting or leaching.
(b) The production and disposal of mining waste.
(c) Prospecting and exploratory activities.

If Imperial County determines that the proposed gravel extraction fits the definition of a surface mining operation, a reclamation plan would be required.

The proposed landfill involves the use of overburden and ore residue from the Mesquite Gold Mine. Such use may require an amendment to the gold mine reclamation plan. The reclamation plan for the gold mine is applicable to a specific piece of property, and includes a description of the proposed use(s) of the land following reclamation (SMARA Sections 2772(h) and 2773). Substantial deviations from the original reclamation plan may not be undertaken until an amendment to the original plan is submitted to, and approved by, the lead agency (SMARA Section 2777).

We also recommend that any adverse effects from the proposed landfill site identified in the EIR be addressed in a reclamation plan and/or an amendment to the Mesquite Gold Mine reclamation plan. For example, the information provided us indicates that desert tortoise (State: Threatened; Federal: Threatened; BLM: Sensitive Species) occurs in the project area. This species had not been listed when the Mesquite Gold Mine reclamation plan was originally prepared. We also recommend that a reclamation plan or amendment address potential off-site impacts associated with implementation of the project.

Please send a copy of the reclamation plan or amendment, if required, permit, and response to our comments to the Mined-Land Reclamation Project office at 801 K Street, MS 09-37, Sacramento, CA 95814-3514. The permit issued by you as lead agency under SMARA and the approved documents will be placed in the Mined-Land Reclamation Project files pursuant to the Surface Mining and Reclamation Act.

If you have any questions on these comments or require any assistance with other mine reclamation issues, please contact James S. Pompy, at (916) 323-8565.

Sincerely,

Stephen E. Oliva
Environmental Program Coordinator

STATE OF CALIFORNIA Pete Wilson, Governor

CALIFORNIA INTEGRATED WASTE MANAGEMENT BOARD
8800 C Center Drive
Sacramento, California 95826

June 18, 1992

Jurg Hueberger
Imperial County Planning/Building Department
939 Main Street
El Centro, CA 92243

Subject: Notice of Preparation (NOP) for a Draft Environmental Impact Report (DEIR)/Environmental Impact Statement for the establishment and operation of the Mesquite Regional Landfill, requiring issuance of a Solid Waste Facility Permit (SWFP), Imperial County.

Dear Mr. Hueberger:

California Integrated Waste Management Board (CIWMB) staff have reviewed the document cited above.

Project Description

The Mesquite Regional Landfill is proposed to be located in eastern Imperial County primarily on the site of the existing Mesquite Mine. The proposed landfill would dispose of nonhazardous municipal solid waste (MSW) initially from Imperial County residents with MSW delivered to the site by rail from Southern California communities upon full buildout. The DEIR will analyze potential environmental impacts from construction and operation of two landfill configurations, a new four to five mile railroad spur extension and intermodal, and phased landfill closure at the proposed facility. The site will employ approximately 268 people, have a capacity of approximately 600 million tons, and operate for approximately 100 years.

CIWMB staff ask that the following comments be addressed in the DEIR:

> California Environmental Quality Act (CEQA) compliance is required for the establishment, expansion or change in operations of a Solid Waste Facility (SWF) and the issuance or revision of a SWFP. The DEIR should include details of the project which will enable decision-makers to 1) identify potential impacts from the proposed project(s), 2) determine whether any such impacts are significant, and 3) ascertain whether significant impacts can be mitigated to a level of insignificance as required by the California Environmental Quality Act (CEQA). Article 10, Section 15151 of CEQA states:

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> An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences.

In order for an environmental document to be considered adequate by CIWMB staff, the potential significant adverse environmental impacts associated with the project's implementation must be identified clearly in the DEIR and discussed in relative detail, including identification of significant and/or adverse environmental impacts which cannot be mitigated which may require a written finding(s) of overriding considerations. Article 9, Section 15126 of the CEQA Guidelines states:

> Direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short-term and long-term effects.

CIWMB staff requests that the DEIR be a self supporting document containing all information and data and/or _specific_ references to support project suppositions and declarations.

Cumulative Impacts

It is important that the DEIR address the cumulative impacts resulting from the individual/proposed project(s) and the combined projects as well as those incremental impacts resulting from the proposed project's implementation.

Land Use Compatibility

The surrounding land use must be designated as compatible with the proposed/current land use(s) at the project site. The local government, in whose jurisdiction the facility is located, must make a finding that the facility is consistent with the General Plan [Public Resources Code (PRC), Section 50000.5] and is identified in the most recent County Integrated/Solid Waste Management Plan [PRC, Section 50000].

Information to be Included in the EIR

Hazardous Waste Program

A Household Hazardous Waste Management Program (HHWP) should be developed and included in the proposed project to be implemented in order to prevent the acceptance and subsequent disposal of hazardous waste. Specific components of the HHWP should include, but not be limited to, the method of separating hazardous wastes from the waste stream; storage facility design, location, security and length of storage; load checking procedures and the number of designated load checkers; posting of signs; the education and training of personnel in the identification and handling of hazardous substances, including the education of commercial and industrial haulers in the policies of the landfill; and identification of the ultimate disposal location for hazardous materials temporarily stored at the landfill.

Risk of Upset/Human Health

In the event of an accident, explosion, fire, derailment, or the release of hazardous substances due to upset conditions or mechanical malfunctions, an Emergency Response Preparedness Plan should be prepared and available at the facility for reference. Personnel should be properly trained to handle emergency situations, including identification, location and use of fire suppression equipment, procedures for evacuation of the premises, and notice for contacting the appropriate authorities in the event of such an occurrence. CIWMB staff request that such a plan be included/described in the DEIR with the appropriate mitigation measures in the event of such an occurrence.

Following is a list of concerns, beyond those described in the NOP, which should also be addressed in the DEIR:

* If another regional landfill is approved for acceptance of Southern California wastes, how will this effect the proposed project in terms of project size, capacity and duration of operation?

* Total maximum daily tonnages, included with the average daily municipal solid waste (MSW) tonnages of each waste category (i.e. residential, etc.) and type (i.e. construction and demolition), projected up to the landfill closure date. Population projections with an analysis of the existing service area should be included to support the projected tonnages. How will incoming tonnages be measured?

- What are the proposed hours and days of operation?

- A discussion of the infrastructure, existing and planned, which will support the existence of a regional landfill at the proposed location. A discussion of the implementation of Assembly Bill 939 goals must be considered.

- Potential impacts to the groundwater resource area(s) underneath the landfill discussed in detail.

- A complete discussion of the structural integrity of the module/lift design, structural integrity of the final landfill configuration, and landfill liner design, including, but not limited to, the hydraulic conductivity (cm/sec) of the liner, underlying soils, and the soils to be used for final cover. Will the overburden and ore residues proposed for cover material be crushed to a homogeneous fine textured material before being used as cover?

- Location and depths of proposed landfill gas (LFG) monitoring and/or collection probes, groundwater monitoring wells, and the leachate collection and removal systems (LCRS), including the testing criterion and schedule during operation, closure and postclosure maintenance periods.

- Identification of the landfill's proposed operating and closure design for surface drainage/runoff and collection. Identify surface runoff, creeks, rivers and/or diversion channels in areas adjacent to the landfill. Indicate the location and permeability of any existing and/or proposed diversion berm(s) which redirect flow away from/around the landfill.

- Surface water quality monitoring program, if any, testing criterion, testing schedule, results and findings.

- Identification of the nearest residential domestic wells and associated impacts thereof, including contingency plans in the event of a well contamination.

- Vadose zone contamination monitoring and control systems/methods, design, location, testing criterion and schedule, if any.

- Program for monitoring of landfill decomposition gases at the landfill and any structures adjacent to the landfill.

- Identification of any known earthquake faults on and/or in the vicinity of the proposed facility and the frequency of seismic activity as well as a range of most probable earthquake (MPE) magnitudes and maximum ground acceleration (MGA).

- Identification of the nearest residential and/or commercial/industrial receptors. Noise, odor control and dust control contingency plans in the event that complaints are lodged against the operator.

- Testing criterion for acceptance of designated waste(s), if any, including the frequency of testing, and the procedures to insure the aforementioned waste(s) are designated to be non-hazardous.

- Impacts associated with the co-disposal of designated waste(s), if any, with MSW.

- Time frame for final grade and revegetation landscape plans including the buffer zone landscape plan.

- A complete description of the proposed facility's equipment and fire protection system/equipment, including, but not limited to, equipment containing fire extinguishers. What is the response time for the nearest Monterey County Fire Department location?

- Complete description of the any materials recovery operations and on-site storage of materials separated on-site and off-site from the waste stream for recycling.

- List the existing and/or proposed hygienic facilities on site as well as first aid equipment accessibility and employee training as well as provisions for the permanent water supply.
- Description of the security on landfill property, including fencing, gates and access roads located on a map.
- Time frame for project implementation.

Mitigation Compliance Schedule (MCS)

As required by Public Resources Code Section 21081.6, the Lead Agency should submit a MCS at the time of local adoption of the EIR. This should identify the impacts associated with the proposed project, identify mitigation measures to reduce impacts to a less than significant level, identify agencies responsible for ensuring the implementation of the proposed mitigations, and identify a monitoring/tracking mechanism.

Enclosed are a disposal facility and materials recovery facility EIR checklists for your reference, although the checklists are designed for new facilities, much of the information is pertinent to this project(s).

CIWMB staff requests the preceding information pursuant to Public Resources Code (PRC), Chapter 5, Section 21160, which states:

> Whenever any person applies to any public agency for a lease, permit, license, certificate, or other entitlement for use, the public agency may require that person to submit data and information which may be necessary to enable the public agency to determine whether the proposed project may have a significant effect on the environment or to prepare an environmental impact report.

CIWMB staff appreciates the opportunity to comment on this project in the early planning phases. If you have any questions regarding these comments please contact me at (916) 255-2439.

Sincerely,

John Loane

John Loane, Associate Waste Management Specialist
Facility Review Branch
Permitting and Compliance Division
California Integrated Waste Management Board

cc: State Clearinghouse

Enclosures

DISPOSAL FACILITY EIR CHECKLIST

I. GENERAL BACKGROUND INFORMATION

- A. Project Location
- B. Owner/Operator of the Facility
- C. Classification of Site (Class II, III, etc.)
- D. Need for the Project
- E. Area Served
- F. Population Served
- G. Population/Area/Service Projections
- H. Existing Facilities
- I. Regional Map
- J. Conformance to County Solid Waste Management Plan
- K. Designation in General Plan

II. PROJECT DESCRIPTION

- A. Site Description
  - 1. Topographic map
  - 2. Size of site (acres)
  - 3. Site Design
    - a) layout map (showing disposal area, building locations, well locations, and property boundaries)
  - 4. Total operating capacity
  - 5. Classification of Wastes to be Received (Group 2, 3, etc.)

6. Average and maximum quantity of materials (residential, commercial, industrial, etc.) received daily

    a) procedures for handling special waste

        - sludge and septic tank pumpings, moisture content thereof

7. Ultimate landfill height (MSL and base to peak)

8. Expected facility life span

9. Current land use

10. Current zoning

11. Land use within 1000 feet of the site boundaries

12. Verification/Certification of nonhazardous wastes to be received

13. Ultimate land use(s)

14. Commercial, public and/or private use

15. Permits required by state and local agencies to implement the project.

B. Operations Description

1. Compliance with California Integrated Waste Management Board, Regional Water Quality Control Board, Department of Health Services and the Environmental Protection Agency standards for disposal

2. Method of disposal (area/trench)

    a) construction of cells

3. Depth of excavation

4. Height of working face

5. Cover
    a) frequency of cover
    b) thickness of cover
    c) suitability of cover material
        - permeability (cm/sec)
    d) amount of cover material needed for the entire project
    e) source and supply of cover material
6. Anticipated compaction
7. Monitoring
    a) responsible party for testing
    b) frequency of testing
    c) testing criterion
8. Number of employees
    a) task assignments
9. Method(s) of waste handling, separation and control
    a) equipment
        - stand-by equipment
10. Hours/days of operation - days/weeks of operation
11. Fire control provisions
12. Vector control provisions
13. Litter control provisions
14. Traffic (including inclement weather)
    a) access routes
    b) unloading
    c) on-site roads
15. Scales

16. Odor control provisions

17. Dust control provisions

18. Record keeping

19. Erosion controls

20. Sedimentation controls

21. Gas monitoring and control systems

22. Compost runoff containment

    a) impermeable barriers

        - permeability of barrier (cm/sec)

    b) collection system

    c) recirculation of runoff

23. Leachate controls

    a) liner

        - type (i.e. clay/synthetic)

        - permeability (cm/sec)

        - sensitivity of liner to acidic or caustic compounds

    b) compaction of underlying soils/permeability achieved after compaction (cm/sec)

    c) containment/collection system

        - recirculation of leachate

    d) impermeable barriers

        - permeability (cm/sec)

24. Leachate monitoring system

25. Description of areas for bulky items

26. Provisions for handling unacceptable materials

27. Resource recovery provisions

28. Fencing and provisions for site security

29. Police protection

30. Drainage/surface water routing

31. Flood protection

32. Site improvements

    a) water

    b) bathroom

    c) telephone

    d) electricity

C. Closure Procedures

1. Final cover

    a) thickness

    b) permeability (cm/sec)

    c) grading

2. Revegation

3. Responsibility for maintenance

4. Responsibility for monitoring

5. Length of maintenance and monitoring responsibility (years)

D. Safety and Health

1. Employee training

E. Risk of Upset

1. Contingency plans

III. EXISTING ENVIRONMENT

A. Climate

1. Average precipitation
    - a) seasonal
    - b) annual
2. Seasonal temperature change
3. Wind
    - a) direction
    - b) velocity
4. Evaporation rate
    - a) seasonal
    - b) annual

B. Air

1. Baseline air quality data
2. Existing vehicular emissions
    - a) landfill equipment
    - b) transport vehicles
3. Projected vehicular emissions
    - a) landfill equipment
    - b) transport vehicles
    - c) evaporative emissions (from volatiles)

C. Surface Water

1. Existing surface waters (streams, rivers, etc.)
2. Drainage courses
3. Average seasonal flows
4. Greatest anticipated 24 hour or 6 day rainfall amount

   5. Beneficial uses of waters
   6. Water quality analyses
   7. Watershed characteristics

D. Subsurface Water

   1. Existing subsurface water (aquifer, aquiclude, etc.)
   2. Beneficial uses of waters
   3. Water quality analyses (site specific tests)
   4. Location of wells within 1 mile of site
   5. Depth to groundwater (from site specific tests)

E. Geology

   1. Description of subsurface strata (in place)
      a) unified soil classification (CH, OH, etc.)
      b) soil texture(s)
         - percent passing #200 sieve
      c) liquid limit(s)
      d) plasticity index(es)
   2. Permeability of soil(s) (from field samples)
   3. Seismicity
      a) faults underlying the site
      b) estimate of seismic risk at the site (distance to nearest fault, maximum projected earthquake of fault, etc.)
   4. Boring logs (including boring locations)
   5. Mineral deposits

F. Land

   1. Descriptions of site surface
   2. Visibility from surrounding area

3. Maximum slope on the site

4. Slope stability (recommended allowable cut)

G. Flora

1. Description of site flora

2. Vegetation which will require permanent removal

3. Relation between vegetation and slope stability and erodability

4. Rare and endangered flora

H. Fauna

1. Description of site fauna

2. Resident population of rodents and other vectors

3. Rare and endangered fauna

I. Noise

1. Background noise levels at and adjacent to the site

2. Location of noise receptors

3. Noise levels generated by the project (both during construction and landfill operations)

J. Social

1. Growth inducement

2. Land use compatibility

a) zoning

b) General Plan compatibility

c) Regional Plan compatibility

d) adjacent land use

3. Aesthetics

a) viewshed impact

K. Historic/Cultural

1. Archaeological sites

    2. Historical sites
    3. Cultural sites

IV. IMPACTS, MITIGATIONS and IRREVERSIBLE IMPACTS

  A. Climate
  B. Air
  C. Surface Water
  D. Subsurface Water
  E. Geology
  F. Land
  G. Flora
  H. Fauna
  I. Noise
  J. Social
  K. Historic

V. ALTERNATIVES

  A. Alternative Locations Reviewed (not an indepth analysis, but a general description)
  B. Transfer Station to Transport to Another Landfill
  C. Resource Recovery and/or Processing, then Disposal
  D. Other Alternatives
  E. No Project

VI. SUMMARY

  A. Brief Summary of Project and Existing Alternatives
  B. Identification (by use of matrix, outline, table, etc.) of Project Impacts and their Respective Mitigation Measures

VII. ORGANIZATION AND PEOPLE CONSULTED

- A. Public Meetings
- B. Public Response to the Local Project
- C. Persons Contributing to the Report and their Qualifications
- D. Persons Consulted

VIII. MITIGATION MONITORING AND IMPLEMENTATION SCHEDULE

- A. Identification of Impacts
- B. Identification of Mitigation Measures
  - 1. Schedule for implementation
- C. Monitoring
  - 1. Frequency
    - a) landfill gas
    - b) groundwater monitoring
    - c) inspections
- D. Identification of Funding Sources
- E. Identification of Responsible Parties

TABLE II-2

MITIGATION MEASURES FOR PROBLEMS WITH SOLID WASTE FACILITIES

	TYPE OF FACILITY			
MITIGATION MEASURES	LANDFILL	WASTE-TO-ENERGY FACILITY	TRANSFER STATION	COMPOSTING FACILITY
Seismic Safety				
a. Reinforce Facility Structures		X	X	X
b. Avoid Placing Disposal Sites in Steep Valleys and Over Water Basins	X			
c. Avoid Placing Facility Structures Over Active Faults	X	X	X	X
Personal Injury				
a. Install Directional Signs	X	X	X	X
b. Install Fencing	X	X	X	X
c. Direct Traffic	X	X	X	X
d. Separate Loading Areas	X	X	X	X
e. Properly Maintain Equipment	X	X	X	X
f. Install/Use Proper Protective Devices	X	X	X	X
g. Install Street Lights/ Night Lighting	X	X	X	X
h. Send Public Awareness Mailers	X	X	X	X
i. Institute a Safety Program	X	X	X	X
Litter				
a. Use Litter Patrols	X	X	X	X
b. Cover Wastes	X			
c. Install Litter Fences	X		X	
d. Limit Hours of Operation	X			
e. Enclose Operations		X	X	X
f. Construct Berms	X			
g. Cover Vehicles	X	X	X	X
h. Send Public Awareness Mailers	X	X	X	X

	TYPE OF FACILITY			
MITIGATION MEASURES	LANDFILL	WASTE-TO-ENERGY FACILITY	TRANSFER STATION	COMPOSTING FACILITY
Noise				
a. Use Land Buffers	X	X	X	X
b. Construct Berms or Walls	X	X	X	X
c. Enclose Operations		X	X	X
d. Limit Hours of Operations	X	X	X	X
e. Install Noise Attenuation Equipment on Machinery	X	X	X	X
f. Locate Facility or Operation Far from Residential Areas	X	X	X	X
Vectors				
a. Cover Waste	X			
b. Use Insecticides	X			X
c. Compact Wastes	X			
d. Frequently Aerate Wastes				X
e. Frequent Removal of Waste		X	X	
f. Shorten Storage Time	X	X	X	X
g. Enclose Storage Facilities		X	X	
h. Maintain Proper Processing Temperatures				X
i. Avoid Overwatering Windrows				X
j. Institute a Vector Control Program	X	X	X	X
Hazardous Materials				
a. Periodically Check Loads	X	X	X	X
b. Inspect Incoming Wastes	X	X	X	X
c. Require Drums To Be Punctured and Cut	X	X	X	X
d. Immediately Remove Materials	X	X	X	X
e. Institute a Public Awareness Program	X	X	X	X

	TYPE OF FACILITY			
MITIGATION MEASURES	LANDFILL	WASTE-TO-ENERGY FACILITY	TRANSFER STATION	COMPOSTING FACILITY
Erosion				
a. Install Proper Drainage Mechanisms	X			
b. Revegetate	X			
c. Properly Compact	X			
d. Properly Design Waste Cells and Lifts	X			
Degradation of Water				
a. Pave Ground		X	X	X
b. Install Liners	X			
c. Provide Proper Drainage	X	X	X	X
d. Provide Drainage Sumps	X			X
e. Divert Water from Operating Face	X			
f. Provide Impermeable Cover	X			
g. Recirculate Leachate	X			
h. Purify Contaminated Water		X	X	
i. Construct Dikes	X			X
j. Install Monitoring System	X			X
k. Cover Waste Storage and Processing Areas		X	X	X
l. Correctly Design Irrigation Equipment				X
m. Avoid Overwatering Windrows				X
n. Limit Amount of Liquid Entering Cell or Final Cover	X			
o. Treat Leachate and Divert to Sewer or Transport Off-Site	X			

	TYPE OF FACILITY			
MITIGATION MEASURES	LANDFILL	WASTE-TO-ENERGY FACILITY	TRANSFER STATION	COMPOSTING FACILITY
Degradation of Air				
a. Install Proper Air Emission Control Equipment		X		
b. Flare Gas Emissions	X			
c. Install Gas Collection Systems	X			
Gas Emissions				
a. Use Impermeable Covers and Liners	X			
b. Install Gas Collection and Control Systems	X			
c. Install Gas Extraction System	X			
d. Flare Gases	X			
Dust				
a. Wet Down Site and Vehicle Loads	X	X	X	X
b. Install Fans		X	X	X
c. Limit Hours of Operations	X		X	X
d. Enclose Grinding Operations		X		X
Visual				
a. Contour or Sculp Landfill Face	X			
b. Use Natural Barriers	X	X	X	X
c. Landscape and Revegetate	X	X	X	X
d. Construct Berms	X	X	X	X
Traffic				
a. Improve Access and Egress Roads	X	X	X	X
b. Restrict Hours of Operation	X	X	X	X
c. Install Signal Lights and Directional Signs	X	X	X	X
d. Institute Split Operations	X			
e. Increase Size of Receiving Area	X	X	X	X

	TYPE OF FACILITY			
MITIGATION MEASURES	LANDFILL	WASTE-TO-ENERGY FACILITY	TRANSFER STATION	COMPOSTING FACILITY
Traffic (continued...)				
f. Limit Residential Users to Certain Days	X	X	X	X
g. Locate Facilities Close to Major Freeways, Major Arteries	X	X	X	X
h. Locate Away from Residential Areas	X	X	X	X
i. Segregate Loading Areas for Residents and Commercial Users	X	X	X	X
Archaeological/Historical Artifacts				
a. Research Literature/Records	X	X	X	X
b. If Unearthed during Construction, Halt Construction and Notify Proper Authorities	X	X	X	X

SOLID WASTE RESOURCE RECOVERY AND TRANSFER FACILITY EIR CHECKLIST

The California Integrated Waste Management Board requires the following items to be addressed in an Environmental Impact Report for a solid waste resource recovery and transfer facility:

I. General Background Information

   A. Project location

   B. Need for the project

   C. Area served

   D. Population served

   E. Population projections

   F. Existing facilities

      1. Transfer stations

      2. Materials recovery facilities

      3. Landfills

   G. Future solid waste facilities planned for same region

   H. Compliance with AB939 requirements

   I. Regional Map

   J. List of all permits required by local, state, and federal agencies for project

   K. Conformance to the Countywide Integrated Waste Management plan

   L. Designation in General Plan

II. Project Description

   A. Site description

      1. Topographic map showing site location

      2. Size of the site (acres)

3. Site layout map (showing the facility, turn around areas, storage areas, and property boundaries)

4. Total handling capacity of the site

5. Maximum daily permitted capacity of wastes (tons/day)

6. Expected facility lifespan (years)

7. Current land use

8. Current zoning

9. All land use within 2500 ft. of site boundaries

10. Owner/operator of the facility

11. Permits required

B. Operations description

1. Facility compliance with CWMB Minimum Standards for Solid Waste Handling and Disposal (Title 14 CCR)

2. General facility design

   a. Facility station configuration and equipment

   b. Energy recovery facility components

   c. Resource recovery facilities

   d. Screening of incompatible wastes - e.g. liquids, hazardous wastes

3. Transportation method for incoming wastes

   a. Vehicle type and frequency (rail-haul inclusive)

   b. General public access

4. Waste components characterization

5. Residue components disposal

   a. Composition

   b. Volume

   c. Handling characteristics

   d. Handling method

    e. Removal frequency
    f. Remaining resource recovery potential
    g. Identification of final disposal site for residual wastes
    h. Distance and travel time to disposal site

6. Traffic
    a. Access routes - feeder roads
    b. Present loading - project induced loading - on and off-site
    c. Anticipated access alterations
    d. Scales - if any

7. Materials Recovery
    a. Types
    b. Volume
    c. Storage
    d. Handling
    e. Transfer/sales and marketing

8. Energy recovery
    a. Amount
    b. Type (steam, electricity, etc.)
    c. Uses
    d. Delivery mechanisms

9. Facility induced air emissions
    a. Background air quality
    b. Project induced - from transfer or materials recovery facility operation and associated traffic
    c. Project induced - from energy recovery
    d. Control mechanisms/mitigations

e. Conformance to existing or proposed local, state, or federal air quality plans and regulations

10. Energy consumption

    a. Transfer facility

    b. Transfer trucks/rail

    c. Resource recovery facility

11. Facility public utility requirements

    a. Water - private or public well, public water line

    b. Sewage - public sewer or septic system

    c. Utilities - gas, electricity

    d. Police/fire protection

12. Fire control provisions - on-site; nearest fire department

13. Vector control provisions - flies, rodents, birds, mosquitoes

14. Litter control provisions - in relation to expected volumes and sources

15. Odor control provisions

16. Dust control provisions

17. Drainage facilities and wastewater disposal

    a. Facility land coverage

    b. Surface water routing

    c. Energy recovery cooling/process water discharge

    d. Transfer station water discharge (refuse pit, tipping floor wash-downs, etc.)

18. Fencing and security provisions

19. Record keeping/scales

20. Hazardous waste provisions - impacts, detection, handling, storage disposal

III. Existing Environment

A. Climate

  1. Average precipitation
    a. Seasonal
    b. Annual
  2. Seasonal temperature range
  3. Wind
    a. Site wind rose

B. Air (refer to Section II.B.8)

  1. Baseline air quality data
  2. Existing vehicular emissions
    a. Refuse vehicles
    b. Other
  3. Projected vehicular emissions
    a. Refuse vehicles
    b. Other

C. Geology

  1. Description of subsurface strata - soils, underlying geological formation
  2. Seismicity
    a. Faults underlying the site
    b. Estimate of seismic risk at the site (distance to nearest fault, magnitude and frequency of maximum anticipated seismic event in project area, etc.)

D. Flora

  1. Description of site flora
  2. Vegetation which will require permanent removal
  3. Rare and endangered flora

- E. Fauna
  - 1. Description of site fauna
  - 2. Resident population of rodents and other vectors
  - 3. Rare and endangered fauna
- F. Noise
  - 1. Background noise levels at and adjacent to the site
  - 2. Location of noise receptors
  - 3. Noise levels generated by transfer facility operation - peak and 8-hour maximum dB exposures in relation to OSHA regulations
- G. Social
  - 1. Growth inducement
  - 2. Land use compatibility
    - a. Zoning
    - b. General plan compatibility - especially Government Code Section 66796.41
    - c. Regional plan compatibility
    - d. Adjacent land use
  - 3. Aesthetics
    - a. Viewshed impact
- H. Historic
  - 1. Archaeological sites
  - 2. Historical sites
- I. Human Health and Safety

IV. Impacts, Mitigations, and Irreversible Impacts

- A. Climate
- B. Air
- C. Geology

D. Flora

E. Fauna

F. Noise

G. Social

H. Historic

I. Human Health and Safety - facility employees and users

V. Alternatives

A. Alternative locations reviewed (not an in depth analysis but a general description)

B. Alternative facility design and/or configuration - larger and smaller project

C. Alternative collection and/or community disposal systems - e.g. curbside

D. Other alternatives

E. No project

VI. Summary

A. Brief summary of project and existing environment

B. Identification (by use of matrix, outline, table, etc.) of all project impacts and their respective mitigation measures

VII. Organization and People Consulted

A. Public meetings

B. Public response to the local project

C. Persons contributing to the report and their qualifications
D. Persons consulted

VIII. Special Note

A. All environmental documents to which CEQA guidelines sections 15205 and 15206 apply must be circulated through the State Clearinghouse for agency review and comment. Environmental Review Branch personnel are available for assistance.

STATE OF CALIFORNIA PETE WILSON, Governor

AIR RESOURCES BOARD
2020 L STREET
P.O. BOX 2815
SACRAMENTO, CA 95812

RECEIVED
JUL 06 1992
IMPERIAL COUNTY
PLANNING DEPARTMENT

June 30, 1992

Jurg Heuberger
Planning Director
Imperial County Planning/Building Department
939 Main Street
El Centro, CA 92243

Dear Mr. Heuberger:

We have reviewed the Imperial County Planning/Building Department's Notice of Preparation (NOP) of a draft Environmental Impact Report (EIR) for the Mesquite Regional Landfill (SCH# 92051024). The NOP states that the proposed project may result in adverse impacts on air quality. To enable adequate analysis of potential air quality impacts, we recommend that the draft EIR contain the following information:

1. A description of the facility, including:
    a. Design specifications for the proposed landfill gas collection system and control device;
    b. Characterization of the landfill gas, and any auxiliary fuels to be used in the proposed project;
    c. Points of emissions (e.g., flare, landfill surface, active face, cover withdrawal area).
2. A description of the proposed activities implemented under the project including:
    a. General description of landfilling process from arrival by truck and rail, through application of soil cover at end of each day;
    b. Capacity and acceptance rate for the existing sanitary landfill and the amount of waste increase in tons per day;
    c. Schedule of operation, and expected date of start-up.
3. A description of the existing environmental setting at the proposed project site and adjacent areas including:
    a. Location;
    b. Meteorology and topography;
    c. Current background and onsite air quality, including information on ambient air concentrations of criteria and noncriteria pollutants;

   d. Population distribution and the proximity of sensitive populations (e.g., residential areas, schools, hospitals);
   e. Existing sources of air pollution in the vicinity of the proposed project.

4. An analysis of the potential air quality impacts due to proposed project activities including:

   a. Construction of the project;
   b. Increased vehicular traffic;
   c. Operation of the landfill, including the landfill gas collection/control system, and proposed energy recovery system.

This analysis should include both criteria air pollutants for which ambient air quality standards exist and noncriteria air pollutants from the landfill. The analysis should also include estimates of average and highest controlled and uncontrolled emission rates of criteria and noncriteria air pollutants, and the basis for the assumptions and calculations used to determine these estimates.

5. An analysis of potential public exposure from the emission of non-criteria air pollutants.

6. A description of mitigation measures to minimize emissions. This discussion should include control equipment, process control, and other technical measures to reduce emissions of criteria and noncriteria air pollutants.

7. A description of similar emission sources proposed in California and the control requirements applicable to these sources.

8. Identification and description of all applicable federal, state, and local air pollution control regulations, and measures to comply with these regulations.

9. A description of alternatives to the proposed project and associated emissions of these alternatives.

We would also like to point out that the local air pollution control district may have jurisdiction over air impacts of any proposed project and should have the opportunity to comment on material contained in the draft EIR. In the case of this proposed facility, the Imperial County Air Pollution Control District should have an opportunity to comment.

We hope that a thorough discussion of the items listed in this letter will provide a better understanding of the air quality aspects of the proposed project and contribute to an effective EIR process. Thank you for the opportunity to participate in the preparation of this draft EIR. If you have questions regarding our comments or if we can be of further assistance, please contact Jim Behrmann, Manager of the Toxics Program Support Section at (916) 322-8273.

Sincerely,

Genevieve Shiroma

Genevieve Shiroma, Chief
Toxic Air Contaminant
Identification Branch

cc: Stephen Birdsall, Imperial County APCD
Gasper Torres, Imperial County APCD
Tom Loftus, State Clearinghouse

SUMMARY OF NOP RESPONSES

Comment No.	Commentor -- Date of Letter NOP Comment	Category	EIS/EIR Section/Remarks
	IVC Barker Museum -- May 11, 1992		
1.	No concerns as to placement of landfill upon Gold Field Property.	A	Copy of this NOP Response letter included in Appendix A-2 of EIS/EIR.
2.	Physical survey should be conducted of any lands, other than the mine itself, that would be impacted.	A	Cultural Resources
3.	Physical archaeological survey of the rail road spur heading and connecting spur line should be conducted.	A	Cultural Resources
	Office of Planning and Research -- May 18, 1992		
4.	Sent NOP to Responsible Agencies (letter includes NOP distribution list).	A	Copy of this NOP Response letter included in Appendix A-2 of EIS/EIR.
	United States Marine Corps -- May 18, 1992		
5.	Access to the Chocolate Mountains Aerial Gunnery Range (CMAGR) will be impacted by the proposed railroad spurs.	A	Transportation
6.	Impacts to CMAGR from birds, windblown debris, and water infiltration into CMAGR.	A	Environmental Health & Public Safety/ Water Resources
7.	CMAGR devoted to live ordinance delivery.	A	Land Use
8.	Mine area is in seismic zone 4.	A	Geology/Soils/Environmental Health & Public Safety
9.	Annual rainfall produces high erosion rates.	A	Water Resources/Biological Resources
10.	Has NOx generated in Mexico and blown north been considered.	A	Air Quality

Notes: A = Already Addressed B = New Scoping Issue C = Not to be included in the EIS/EIR
N/A = Not Applicable

SUMMARY OF NOP RESPONSES

Comment No.	Commentor -- Date of Letter NOP Comment	Category	EIS/EIR Section/Remarks
	California Department of Fish and Game -- May 19, 1992		
11.	Identification of biological resources within the project area and project-related impacts.	A	Biological Resources
12.	Impacts on streams/water courses on or near the project.	A	Water Resources/Biological Resources
13.	Endangered species consultation with the CDFG will be necessary because project site lies within the historic range of the Mojave ground squirrel which is State-listed.	A, B	Biological Resources
	Southern California Association of Governments -- May 21, 1992		
14.	Project is not regionally significant per Area-wide Clearinghouse criteria.	A	Subsequent to the issuance of this letter, the Southern California Association of Governments found the proposed Mesquite Regional Landfill to be a "regionally significant project."
15.	Assigned SCAG Clearing housing number IM-55713-NPR.	N/A	Comment noted.
	Imperial Irrigation District -- May 22, 1992		
16.	Project-related impacts to the power generation and transmission facilities of the Imperial Irrigation District.	A	Energy/Public Services and Utilities

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SUMMARY OF NOP RESPONSES

Comment No.	Commentor -- Date of Letter NOP Comment	Category	EIS/EIR Section/Remarks
	United States Fish and Wildlife Service (USFWS) -- May 26. 1992		
17.	Requesting the USFWS Enhancement Office in Carlsbad be added to Imperial County Planning Department's mailing list.	N/A	USFWS Enhancement Office in Carlsbad has been added to Imperial County Planning Department's mailing list.
	United States Fish and Wildlife Service (USFWS) -- June 2, 1992		
18.	Recycling activities should be a consideration in the project.	A	Project Background/Alternatives/ Project Description
19.	Dept. is concerned about the additional impact on wildlife habitat at the landfill and the occurrence of federally and state threatened desert tortoise.	A	Biological Resources
20.	Copy of NOP forwarded to the USFWS Enhancement Office in Carlsbad for any possible formal consultation required.	N/A	Comment noted.
	Air Pollution Control District -- June 4, 1992		
	Description of the facility:		
21.	• Types/quantities of waste.	A	Project Description/Air Quality
22.	• Proposed diversion/recovery programs, loading and disposal operations.	A	Project Background/Project Description
23.	• Landfill capacity/acceptance rates.	A	Project Description
24.	Operations schedule, expected start-up date.	A	Project Description
	Description of existing setting:		

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N/A = Not Applicable

SUMMARY OF NOP RESPONSES

Comment No.	Commentor -- Date of Letter NOP Comment	Category	EIS/EIR Section/Remarks
	Air Pollution Control District -- June 4, 1992 (Continued)		
25.	• Meteorology/topography.	A	Air Quality
26.	• Background on-site air quality (criteria and non-criteria pollutants).	A	Air Quality
27.	• Population distribution and proximity to sensitive populations.	A	Air Quality/Land Use/Socioeconomics/ Environmental Health & Public Safety
28.	• Existing sources of air pollution.	A	Air Quality
	Air Pollution Control District -- June 4, 1992 (continued)		
29.	• Air quality impacts from construction, vehicular traffic, and landfill operations including landfill gas collection/control system.	A	Air Quality/Environmental Health & Public Safety
30.	• Potential public exposure to emissions.	A	Air Quality/Environmental Health & Public Safety
31.	• Mitigation measures.	A	Air Quality/Environmental Health & Public Safety
32.	• Description of similar emission sources.	A	Air Quality
33.	• Identification of applicable federal/state/local regulations.	A	Air Quality/Environmental Health & Public Safety
34.	• Alternatives.	A	Alternatives/Air Quality

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N/A = Not Applicable
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SUMMARY OF NOP RESPONSES

Comment No.	Commentor -- Date of Letter	Category	EIS/EIR Section/Remarks
	NOP Comment		
	California Department of Fish and Game -- June 9, 1992		
35.	Possible impacts of the landfill and railroad spur on desert tortoise populations and the potential for the landfill to increase the number of ravens in the area (a known predator on desert tortoise).	A	Biological Resources
36.	DEIR should include results of desert tortoise surveys along rail route and at the landfill site.	A	Biological Resources
37.	Mitigation measures relating to ravens should be presented, including but not limited to, pre- and post raven population monitoring and raven population reduction methods, if necessary.	A	Biological Resources/Environmental Health & Public Safety
	California Department of Conservation -- June 15, 1992		
38.	The proposed project would meet the criteria of "mined lands" under Stection 2729 of the Surface Mining and Reclamation Act (SMARA).	A	Geology/Soils/Mineral Resources
39.	If Imperial County determines that proposed gravel extraction, included in the project description, fits the definition of a surface mining operation (as defined under Section 2735 of SMARA), a reclamation plan would be required.	C	Not to be included in the EIS/EIR
40.	An amendment to the Mesquite Mine reclamation plan may be required because the proposed landfill involves the use of overburden and ore residue from the Mesquite Gold Mine.	C	Not to be included in the EIS/EIR

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N/A = Not Applicable

SUMMARY OF NOP RESPONSES

Comment No.	Commentor -- Date of Letter	Category	EIS/EIR Section/Remarks
	NOP Comment		
	California Department of Conservation -- June 15, 1992 (Continued)		
41.	The reclamation plan for the Mesquite Mine is applicable to a specific piece of property, and includes a description of the proposed use(s) of the land following reclamation (SMARA Sections 2772 (h) and 2773). Substantial deviations from the original reclamation plan may not be undertaken until an amendment to the original plan is submitted to lead agency.	C	Not to be included in the EIS/EIR
42	Any adverse effects from proposed landfill addressed in EIR, must also be addressed in the reclamation plan and/or an amendment to the Mesquite Gold Mine Reclamation Plan.	C	Not to be included in the EIS/EIR
43	It is recommended that any potential off-site impacts associated with the project are addressed in the reclamation plan or amendment.	C	Not to be included in the EIS/EIR
44.	Send copy of reclamation plan or amendment, if required, permit, and response to comments to the Mined-Land reclamation Project office.	C	Not to be included in the EIS/EIR
	Air Resources Board -- June 30, 1992		
45.	Design specifications for the proposed landfill gas collection system and control device.	A	Air Quality, Environmental Health & Public Safety, Project Description
46.	Characterization of the landfill gas, and any auxiliary fuels to be used in the proposed project.	A	Air Quality, Environmental Health & Public Safety
47.	Points of emissions (e.g., flare, landfill surface, active face, cover withdrawal area).	A	Air Quality, Environmental Health & Public Safety
48.	General description of landfilling process from arrival by truck and rail, through application of soil cover at end of each day.	A	Project Description

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SUMMARY OF NOP RESPONSES

Comment No.	Commentor -- Date of Letter	Category	EIS/EIR Section/Remarks
	NOP Comment		
	Air Resources Board -- June 30, 1992 (Continued)		
49.	Capacity and acceptance rate for existing sanitary landfill and the amount of waste increase in tons per day.	A	Alternatives
50.	Schedule of operation, and expected date of start-up.	A	Project Description
51.	Location.	A	Project Description
52.	Meteorology and topography.	A	Air Quality, Geology/Soils/Mineral Resources
53.	Current background and on-site air quality, including information on ambient air concentrations of criteria and noncriteria pollutants.	A	Air Quality
54.	Population distribution and the proximity of sensitive populations (e.g., residential area, schools, hospitals).	A	Socio-Economics
55.	Existing sources of air pollution in the vicinity of the proposed project.	A	Air Quality
56.	Construction of the project.	A	Air Quality
57.	Increased vehicular traffic.	A	Air Quality
	Air Resources Board -- June 30, 1992 (continued)		
58.	Operation of the landfill, including the landfill gas collection/control system, and proposed energy recovery system.	A	Air Quality, Environmental Health & Public Safety
59.	An analysis of potential public exposure from the emission of noncriteria air pollutants.	A	Air Quality, Environmental Health & Public Safety

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N/A = Not Applicable

SUMMARY OF NOP RESPONSES

Comment No.	Commentor -- Date of Letter	Category	EIS/EIR Section/Remarks
	NOP Comment		
	Air Resources Board -- June 30, 1992 (continued)		
60.	A description of mitigation measures to minimize emissions. This discussion should include control equipment, process control, and other technical measures to reduce emissions of criteria and noncriteria air pollutants.	A	Air Quality
61.	A description of similar emission sources proposed in California and the control requirements applicable to these sources.	A	Air Quality, Alternatives
62.	Identification and description of all applicable federal, state, and local air pollution control regulations, and measures to comply with these regulations.	A	Air Quality
63.	A description of alternatives to the proposed project and associated emissions of these alternatives.	A	Alternatives
	California Department of Fish and Game -- June 4, 1992		
64.	A complete assessment of flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened and locally unique species and sensitive and critical habitats.	A	Biology
65.	A discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts.	A	Biology, Cumulative Impacts

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N/A = Not Applicable

SUMMARY OF NOP RESPONSES

Comment No.	Commentor -- Date of Letter	Category	EIS/EIR Section/Remarks
	NOP Comment		
	California Department of Fish and Game -- June 4, 1992 (continued)		
66.	A discussion of potential adverse impacts from any increased runoff, sedimentation, soil erosion, and/or urban pollutants on streams and watercourses on or near the project site, with mitigation measures proposed to alleviate such impacts.	A	Biology, Geology/Soils/Mineral Resources, Water Resources
67.	Stream buffer areas and maintenance in their natural condition through non-structural flood control methods should also be considered in order to continue their high value as wildlife corridors.	A	Biology, Water Resources
68.	Their should be a discussion of alternatives to minimize adverse impacts to wildlife as well as the direct benefit to wildlife and wildlife habitat. These discussions should consider CDFG policy of no net loss of wetland acreage or habitat values.	A	Alternatives
	Integrated Waste Management Board -- June 18, 1992		
69.	Diversion, obstruction of the natural flow, or changes in the bed, channel, or bank of any river, stream, or lake will require notification to the Department of Fish and Game as called for in the Fish and Game Code. Notification should be made after the project is approved by the lead agency.	A	Biology, Water Resources
70.	The project should be in compliance with CEQA.	A	Introduction
71.	Cumulative impacts should be addressed.	A	Cumulative Impacts
72.	Land Use compatibility should be addressed.	A	Land Use

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SUMMARY OF NOP RESPONSES

Comment No.	Commentor -- Date of Letter	Category	EIS/EIR Section/Remarks
	NOP Comment		
	Integrated Waste Management Board -- June 18, 1992 (Continued)		
73.	A Household Hazardous Waste Management Program (HHWMP) should be developed and included in the proposed project to prevent the acceptance of hazardous waste on the site.	A	Environmental Health & Public Safety
74.	Risk of Upset/Human Health should be addressed.	A	Environmental Health & Public Safety
75.	If another regional landfill is approved for acceptance of southern California wastes, how will this effect the proposed project in terms of project size, capacity and duration of operation?	A	Alternatives, Cumulative Impacts
76.	Tonnages and categories of wastes to be disposed of projected up to the closure date.	A	Project Description
77.	Operation hours.	A	Project Description
78.	A discussion of infrastructure and implementation of AB 939.	A	Project Description
79.	Groundwater impacts discussion.	A	Water Resources
80.	Structural integrity of module/lift design, and final landfill liner design. Will overburden be crushed to a fine textured material before being used as cover?	A	Project Description
81.	Location and depth of proposed landfill gas monitoring and/or collection probes, groundwater monitoring wells, and the leachate collection and removal systems, including the testing criterion and schedule during operation, closure and postclosure maintenance periods.	A	Air Quality, Water Resources, Environmental Health & Public Safety

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N/A = Not Applicable

SUMMARY OF NOP RESPONSES

Comment No.	Commentor -- Date of Letter	Category	EIS/EIR Section/Remarks
	NOP Comment		
	Integrated Waste Management Board -- June 18, 1992 (continued)		
82.	Identification of the landfill's proposed operating and closure design for surface drainage/runoff and collection.	A	Water Resources
83.	Surface water quality monitoring program, if any, testing criterion, testing schedule, results and findings.	A	Water Resources
84.	Identification of the nearest residential domestic wells and associated impacts.	A	Water Resources, Environmental Health & Public Safety
85.	Vadose zone contamination monitoring and control system/ methods,design, location, testing criterion and schedule, if any.	A	Water Resources
86.	Program for monitoring landfill decomposition gasses.	A	Air Quality, Environmental Health & Public Safety
87.	Identification of known earthquake faults in the vicinity, frequency of seismic activity, and range of most probable earthquake.	A	Geology/Soils/Mineral Resources
88.	Identification of the nearest residential and/or commercial/industrial receptors. Noise, odor control and dust control contingency plans in the event that complaints are lodged against the operator.	A	Noise, Air Quality, Introduction
89.	Testing to ensure only non-hazardous wastes are accepted.	A	Environmental Health & Public Safety
90.	Impacts associated with the co-disposal of designated wastes with MSW.	A	Project Description, Biology
91.	Time frame for final grade and revegetation landscape plans including buffer zone landscaped plan.	A	Environmental Health & Public Safety
92.	A complete description of the facility's equipment and fire protection system/equipment. What is the response time for the nearest Imperial County Fire Department location?	A	Project Description

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N/A = Not Applicable

Comment No.	Commentor -- Date of Letter NOP Comment	Category	EIS/EIR Section/Remarks
	Integrated Waste Management Board -- June 18, 1992 (continued)		
93.	Complete description of the materials recovery operations and on-site storage of materials separated on-site and off-site from waste stream for recycling.	A	Environmental Health & Public Safety
94.	List the existing and/or proposed hygienic facilities on-site, first aid equipment accessibility, employee training, and water supply.	A	Project Description
95.	Description of the security on landfill property, including fencing, gates and access roads located on a map.	A	Project Description
96.	Time frame for project implementation.	A	Introduction

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N/A = Not Applicable

NOTICE OF INTENT AND RESPONSES

MAY - JULY, 1992

4310-40

2-00160

DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT

(CA-060-02-5440-10-B026)

Proposed Right-of-Way and Land Exchange for Proposed Mesquite Regional Landfill

AGENCY: Bureau of Land Management, Interior

ACTION: Notice of Intent

SUMMARY: Notice is hereby given that the BUREAU OF LAND MANAGEMENT (BLM) and the County of Imperial will prepare a joint Federal-County Environmental Impact Report/Statement (EIR/EIS) for a proposed right-of-way and land exchange, in connection with a proposed Class III Municipal Solid Waste (MSW) landfill in eastern Imperial County, California.

Gold Fields Mining Co. (Gold Fields), Western Waste Industries, and S.P. Environmental Systems have formed a partnership (Partnership) that would own and develop the landfill located contiguous to the site of the currently operating Mesquite Gold Mine and Ore Processing Facility (Mesquite Mine) in eastern Imperial County. The project would also include the storage of recyclable materials, railcar unloading and loading, rail and equipment maintenance, landfill gas recovery and destruction by flaring or utilization of energy recovery techniques, leachate collection and processing, and wastewater treatment.

DATES: For Scoping Meetings and Comments: Public scoping meetings will be held on the following dates: 7:00 pm, Wednesday, May 27, 1992, at the El Centro Community Center, 375 South First Street, El Centro, California 92243, (619 337-4555); 7:00 pm, Thursday, May 28, 1992, at the Desert Expo Center, Fine Arts Building, 46-350 Arabia Street, Indio, California 92201 (619-863-8247). Comments are being requested to help identify significant issues or concerns related to the proposed action, to determine the scope of the issues (including alternatives) that need to be analyzed, and to identify and eliminate from detailed study those issues that are not significant. All comments recommending that the EIR/EIS address specific environmental issues should contain supporting documentation.

ADDRESS: Written comments must be filed no later than June 12, 1992, reference BLM CA-29617, and should be addressed to Area Manager, Bureau of Land Management, El Centro Resource Area, 333 South Waterman Avenue, El Centro, California 92243-2298.

FOR ADDITIONAL INFORMATION CONTACT: Ben Koski, Area Manager, Bureau of Land Management, El Centro Resource Area, 333 South Waterman Avenue, El Centro, California 92243-2298.

SUPPLEMENTARY INFORMATION: The proposed landfill would be located primarily on Mesquite Mine property adjacent to the existing Mesquite Mine in a sparsely populated portion of eastern Imperial County. The nearest residences would be located at the Boardman and Glamis Beach Store areas, located approximately 3 and 3.5 miles, respectively, southwest of the proposed landfill.

The cities of Brawley and Palo Verde are located approximately 35 miles to the west and northeast, respectively. In addition to the existing mining operation, other land uses near the project area include: (1) gravel borrowing from federal land immediately to the west of the Mesquite Mine which has been designated as a gravel withdrawal area by the BLM, (2) the Chocolate Mountains Aerial Gunnery Range, immediately north of the Mesquite Mine, which is actively used for military aircraft training, and (3) recreational vehicle activity (primarily weekends) in the Imperial Sand Dunes Recreation Area further to the west. Excavated materials from the mine, which has been operated by Gold Fields since 1985, would be used for most of the daily, intermediate and final cover requirements at the proposed landfill, resulting in the productive utilization of a large portion of the mine overburden and ore residue piles. Claystone portions of the overburden removed from the mine pit areas would be used to construct clay sections of the landfill base liner. Approximately 600 million tons of Class III MSW would be deposited at the landfill, which could operate for about 100 years. The landfill would be designated to extend above the existing desert floor elevation to maintain maximum separation above the limited ground water resources in the area. The landfill will not be located in the existing mine pits which are still in operation, and will contain residual mineralization at the time of the mine's closure in 10 to 15 years.

The project would also include a four-to-five-mile (approximate, depending on final alignment) railroad spur extending from the existing Southern Pacific main line track to a special container handling facility (intermodal), constructed at the landfill to facilitate MSW delivery and handling. The MSW would be transported to the new spur over existing rail systems from various locations in southern California. The spur alignment would be designed to follow natural topography and drainages, minimize new disturbance of land, and avoid interference with existing recreational activities near Highway 78. The MSW would be transported in completely enclosed transport containers or specially designed rail cars.

Two project configurations are being evaluated. One project configuration, referred to as Project "A", is located on land owned by Gold Fields, except for four small parcels consisting of about 100 acres of federal land within the proposed boundary. The other project configuration, referred to as Project "B", consists of the area proposed for Project "A" plus an additional 1,742 acres of adjacent lands which are also currently owned by the federal government and managed by the BLM. Though they would involve different configurations, both Project "A" and Project "B" would function in very much the same way, operationally.

The proposed exchange of land would allow the Partnership to obtain ownership of all land contained within either the Project "A" or "B" boundaries, depending upon the finally determined project configuration. The land offered for exchange has been selected to enhance protection of important habitat, or enhance the BLM's ability to manage federally-owned scenic areas. Final selection of the project configuration will be determined after completing the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) public review processes.

The proposed landfill would be constructed and operated using state-of-the-art engineering and regulatory procedures, to meet strict federal and state guidelines for landfill construction and operation, and safeguard against contamination of the environment.

For the Mesquite Regional Landfill, ground water resources would be protected by a specially designed impermeable liner and overlying leachate collection system constructed prior to placement of the municipal solid waste. Initially, the liner would be a composite system of low permeability clay and very low permeability synthetic material. Modifications to the liner system would be made in the future, as appropriate, to suit operational experiences and new synthetic material which may be developed during the 100-year landfill life. A gas collection system would be constructed as the landfill cells are developed. Collected landfill gas would be controlled by an onsite flare system, used to generate electricity for onsite use and/or offsite sale, or processed for use as commercial grade fuel. Ground water, gas and vadose zone (if appropriate) monitoring systems would be provided to demonstrate adequacy of the landfill design and operation. Watershed drainage on and around the landfill would be controlled with constructed channels and berms designed to become part of the extensive flood diversion system in the area which has been developed for the Mesquite Mine. Drainage of rainfall directly onto the landfill would be controlled by a system of benches, berms, protected ditches, and pipes, which would direct water away from exposed trash and into the flood diversion channels. Water that occasionally reaches small uncovered trash working areas would be collected and sent to an onsite treatment plant.

Potential issues include, but are not limited to, air quality, social and economic impacts, ground and surface water quality, impacts to desert tortoise habitat, cultural or historical resources, and recreation values.

G. Ben Koski
Area Manager

2000
mesquite landfill

Reason: Secured Area

Virginia

Parcel 1 (Byrd Field)
Richmond IAP
5680 Beulah Road
Richmond Co: Henrico VA 23150–
Landholding Agency: Air Force
Property Number: 189010435
Status: Unutilized
Reason: Floodway

Parcel 3 (Byrd Field)
Richmond IAP
5680 Beulah Road
Richmond Co: Henrico VA 23150–
Landholding Agency: Air Force
Property Number: 189010436
Status: Unutilized
Reason: Within 2000 ft. of flammable or explosive material

Parcel 2 (Byrd Field)
Richmond IAP
5680 Beulah Road
Richmond Co: Henrico VA 23150–
Landholding Agency: Air Force
Property Number: 189010437
Status: Unutilized
Reason: Within 2000 ft. of flammable or explosive material, Secured Area

ANG Site
Camp Pendleton
Virginia Air National Guard
Virginia Beach Co: (See County) VA 23451–
Landholding Agency: Air Force
Property Number: 189010589
Status: Unutilized
Reason: Secured Area

Washington

Fairchild AFB
SE corner of base
Fairchild AFB Co: Spokane WA 99011–
Landholding Agency: Air Force
Property Number: 189010137
Status: Unutilized
Reason: Secured Area

Fairchild AFB
Fairchild AFB Co: Spokane WA 99011–
Location: NW corner of base
Landholding Agency: Air Force
Property Number: 189010138
Status: Unutilized
Reason: Secured Area

[FR Doc. 92–10608 Filed 5–7–92; 8:45 am]

BILLING CODE 4210–29–M

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[CA–060–02–5440–10–B026]

Proposed Right-of-Way and Land Exchange for Proposed Mesquite Regional Landfill

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of intent.

SUMMARY: Notice is hereby given that the Bureau of Land Management (BLM) and the County of Imperial will prepare a joint Federal-County Environmental Impact Report/Statement (EIR/EIS) for a proposed right-of-way and land exchange, in connection with a proposed Class III Municipal Solid Waste (MSW) landfill in eastern Imperial County, California.

Gold Fields Mining Co. (Gold Fields), Western Waste Industries, and S.P. Environmental Systems have formed a (Partnership) that would own and develop the landfill located contiguous to the site of the currently operating Mesquite Gold Mine and Ore Processing Facility (Mesquite Mine) in eastern Imperial County. The project would also include the storage of recyclable materials, railcar unloading and loading, rail and equipment maintenance, landfill gas recovery and destruction by flaring or utilization of energy recovery techniques, leachate collection and processing, and wastewater treatment.

DATES: *For Scoping Meetings and Comments:* Public scoping meetings will be held on the following dates: 7 p.m., Wednesday, May 27, 1992, at the El Centro Community Center, 375 South First Street, El Centro, California 92243, (619–337–4555); 7 p.m., Thursday, May 28, 1992, at the Desert Expo Center, Fine Arts Building, 46–350 Arabia Street, Indio, California 92201 (619–863–8247). Comments are being requested to help identify significant issues or concerns related to the proposed action, to determine the scope of the issues (including alternatives) that need to be analyzed, and to identify and eliminate from detailed study those issues that are not significant. All comments recommending that the EIR/EIS address specific environmental issues should contain supporting documentation.

ADDRESSES: Written comments must be filed no later than June 12, 1992, reference BLM CA–29617, and should be addressed to Area Manager, Bureau of Land Management, El Centro Resource Area, 333 South Waterman Avenue, El Centro, California 92243–2298.

FOR ADDITIONAL INFORMATION CONTACT: Ben Koski, Area Manager, Bureau of Land Management, El Centro Resource Area, 333 South Waterman Avenue, El Centro, California 92243–2298.

SUPPLEMENTARY INFORMATION: The proposed landfill would be located primarily on Mesquite Mine property adjacent to the existing Mesquite Mine in a sparsely populated portion of eastern Imperial County. The nearest residences would be located at the Boardman and Glamis Beach Store areas, located approximately 3 and 3.5 miles, respectively, southwest of the proposed landfill.

The cities of Brawley and Palo Verde are located approximately 35 miles to the west and northeast, respectively. In addition to the existing mining operation, other land uses near the project area include: (1) Gravel borrowing from federal land immediately to the west of the Mesquite Mine which has been designated as a gravel withdrawal area by the BLM, (2) the Chocolate Mountains Aerial Gunnery Range, immediately north of the Mesquite Mine, which is actively used for military aircraft training, and (3) recreational vehicle activity (primarily weekends) in the Imperial Sand Dunes Recreation Area further to the west. Excavated materials from the mine, which has been operated by Gold Fields since 1985, would be used for most of the daily, intermediate and final cover requirements at the proposed landfill, resulting in the productive utilization of a large portion of the mine overburden and ore residue piles. Claystone portions of the overburden removed from the mine pit areas would be used to construct clay sections of the landfill base liner. Approximately 600 million tons of Class III MSW would be deposited at the landfill, which could operate for about 100 years. The landfill would be designated to extend above the existing desert floor elevation to maintain maximum separation above the limited ground water resources in the area. The landfill will not be located in the existing mine pits which are still in operation, and will contain residual mineralization at the time of the mine's closure in 10 to 15 years.

The project would also include a four-to-five-mile (approximate, depending on final alignment) railroad spur extending from the existing Southern Pacific main line track to a special container handling facility (intermodal), constructed at the landfill to facilitate MSW delivery and handling. The MSW would be transported to the new spur over existing rail systems from various locations in southern California. The spur alignment would be designed to follow natural topography and drainages, minimize new disturbance of land, and avoid interference with existing recreational activities near Highway 78. The MSW would be transported in completely enclosed transport containers or specially designed rail cars.

Two project configurations are being evaluated. One project configuration, referred to as Project "A", is located on land owned by Gold Fields, except for four small parcels consisting of about 100 acres of federal land within the proposed boundary. The other project configuration referred to as Project "B", consists of the area proposed for Project "A" plus an additional 1,742 acres of adjacent lands which are also currently owned by the federal government and managed by the BLM. Though they would involve different configurations, both Project "A" and Project "B" would function in very much the same way, operationally.

The proposed exchange of land would allow the Partnership to obtain ownership of all land contained within either Project "A" or "B" boundaries, depending upon the finally determined project configuration. The land offered for exchange has been selected to enhance protection of important habitat, or enhance the BLM's ability to manage federally-owned scenic areas. Final selection of the project configuration will be determined after completing the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) public review processes.

The proposed landfill would be constructed and operated using state-of-the-art engineering and regulatory procedures, to meet strict federal and state guidelines for landfill construction and operation, and safeguard against contamination of the environment.

For the Mesquite Regional Landfill, ground water resources would be protected by a specially designed impermeable liner and overlying leachate collection system constructed prior to placement of the municipal solid waste. Initially, the liner would be a composite system of low permeability clay and very low permeability synthetic material. Modifications to the liner system would be made in the future, as appropriate, to suit operational experiences and new synthetic material which may be developed during the 100-year landfill life. A gas collection system would be constructed as the landfill cells are developed. Collected landfill gas would be controlled by an onsite flare system, used to generate electricity for onsite use and/or offsite sale, or processed for use as commercial grade fuel. Ground water, gas and vadose zone (if appropriate) monitoring systems would be provided to demonstrate adequacy of the landfill design and operation. Watershed drainage on and around the landfill would be controlled with constructed channels and berms designed to become part of the extensive flood diversion system in the area which has been developed for the Mesquite Mine. Drainage of rainfall directly onto the landfill would be controlled by a system of benches, berms, protected ditches, and pipes, which would direct water away from exposed trash and into the flood diversion channels. Water that occasionally reaches small uncovered trash working areas would be collected and sent to an onsite treatment plant.

Potential issues include, but are not limited to, air quality, social and economic impacts, ground and surface water quality, impacts to desert tortoise habitat, cultural or historical resources, and recreation values.

G. Ben Koski,

Area Manager.

[FR Doc. 92–10743 Filed 5–7–92; 8:45 am]

BILLING CODE 4310-40-M

[OR–013–02–4410–13: GP2–219]

Lakeview District Multiple Use Advisory Council and Grazing Advisory Board; Meeting

AGENCY: Bureau of Land Management, Lakeview District.

ACTION: Notice of joint tour.

SUMMARY: The Lakeview District Multiple Use Advisory Council and Grazing Advisory Board will meet for a tour at the Klamath Falls Resource Area Office, 2795 Anderson, #25, Klamath Falls, OR. The focus of the tour will be grazing, riparian and recreation management of the Stukel Mountain Area, especially as it applies to future decisions in the ongoing Klamath Falls Resource Management Plan

The public is invited to attend the tour but a high profile four-wheel drive vehicle is needed and limited space is available in the vehicles provided. If you would like to attend, you must contact the Lakeview District Office by Tuesday, May 19.

DATES: Thursday, May 21, 1992, 9:30 a.m. to 4:30 p.m.

FOR FURTHER INFORMATION CONTACT: Renee Snyder, Public Affairs Officer, 1000 South Ninth Street, Lakeview, OR 97630, (503) 947–6110.

Judy Ellen Nelson,

District Manager.

[FR Doc. 92–10799 Filed 5–7–92; 8:45 am]

BILLING CODE 4310-33-M

[AZ–020–02–4212–12; AZA 26587]

Realty Action: Exchange of Public Lands; Arizona

BLM proposes to exchange public land in order to achieve more efficient management of the public land through consolidation of ownership.

The following described public lands are being considered for disposal by exchange pursuant to section 206 of the Federal Land Policy and Management Act of October 21, 1976, 43 U.S.C. 1716.

Gila and Salt River Meridian, Arizona

Affecting the following 399.83 acres in Maricopa County:

T. 5N., R. 3 E.,
  Sec. 1, SE¼NE¼.
T. 5 N., R. 4 E.,
  Sec. 6, SW¼NE¼.
T. 6 N., R. 3 E.,
  Sec. 35, E½NW¼SE¼NW¼.
T. 6 N., R. 4 E.,
  Sec. 1, S½SW¼
  Sec. 11, NE¼ less MS 4334;
  Sec. 12, NW¼ less MS 4334.

Affecting approximately 1,049.29 acres in Pinal County, as follows:

T. 4 S., R. 8 E.,
  Sec. 13, NE¼, W½SE¼SW¼, SE¼SE¼SW¼, N½SE¼, SW¼SE¼, SE¼, SE¼, SW¼SE¼SE¼.
T. 4 S., R. 9 E.,
  Sec. 11, S½SE¼;
  Sec. 26, N½N½, SW¼NE¼, S½NW¼;
  Sec. 27, N½NW¼.
T. 5 S., R. 8 E.,
  Sec. 34, lots 1 to 8, incl., 12, 14, 16 to 18, incl., 26, 27, 31 to 33, incl.
T. 5 S., R. 9 E.,
  Sec. 8, W½NW¼NW¼SE¼.
T. 7 S., R. 4 E.,
  Sec. 10, S½NE¼,SE¼;
  Sec. 15, NE¼SE¼;
  Sec. 21, W½SW¼.

Final determination on disposal will await completion of an environmental analysis.

In accordance with the regulations of 43 CFR 2201.1(b), publication of this Notice will segregate the affected public lands from appropriation under the public land laws, and the mining laws, but not the mineral leasing laws or Geothermal Steam Act.

The segregation of the above-described lands shall terminate upon issuance of a document conveying such lands upon publication in the Federal Register of a notice of termination of the segregation; or the expiration of two years from the date of publication, whichever occurs first.

For a period of forty-five (45) days, interested parties may submit comments to the District Manager, Phoenix District Office, 2015 West Deer Valley Road, Phoenix Arizona 85027.

Dated: May 4, 1992.

Henri R. Bisson,

District Manager.

[FR Doc. 92–10896 Filed 5–7–92; 8:45 am]

BILLING CODE 4310-32-M

D/R

DEPARTMENT OF DEFENSE
UNITED STATES OF AMERICA

UNITED STATES MARINE CORPS
U.S. MARINE CORPS AIR STATION
YUMA, ARIZONA 85369-5001

2000
Mesquite
Landfill

IN REPLY REFER TO:
11000
3AQ
18 MAY 1992

Mr. Jurg Heuberger
Planning Director
Imperial County Planning Department
939 Main Street
El Centro, California 92243-2856

Dear Mr. Heuberger:

The Imperial County change of zone application, comprehensive general plan amendment and conditional use permit application for the Mesquite Regional Landfill has been reviewed by this Command. There are certain areas of concern I would like to bring to your attention.

Access to the Chocolate Mountains Aerial Gunnery Range (CMAGR) will be impacted by any of the proposed railroad spurs. The attached map shows the approximate location of the two existing roads utilized by Marines to enter the southern portion of the CMAGR. Crossings must be provided and maintained at both sites at no expense to the Government and the crossings cannot be blocked by trains waiting to be unloaded. The military must insist on free unencumbered access to the CMAGR.

Additionally; there are some specific comments I would like to make:

a. Page 1-3, Paragraph 1-1. CMAGR is actively used by tactical aircraft devoted to live ordnance delivery.

b. Page 1-3, Paragraph 1-1. The Mesquite Mine Area is in seismic zone 4.

c. Page 1-3, Paragraph 1-1. Annual rainfall is small but comes in short time intervals producing high erosion rates.

d. Page 4-11, Paragraph 4.3.4. Minimizing the attraction of birds and windblown debris and water infiltration onto the CMAGR is of prime concern to the Marine Corps.

e. Page 5-2, Paragraph 5.2.2. Has the NO_x generated in Mexico and blown north been considered?

RECEIVED

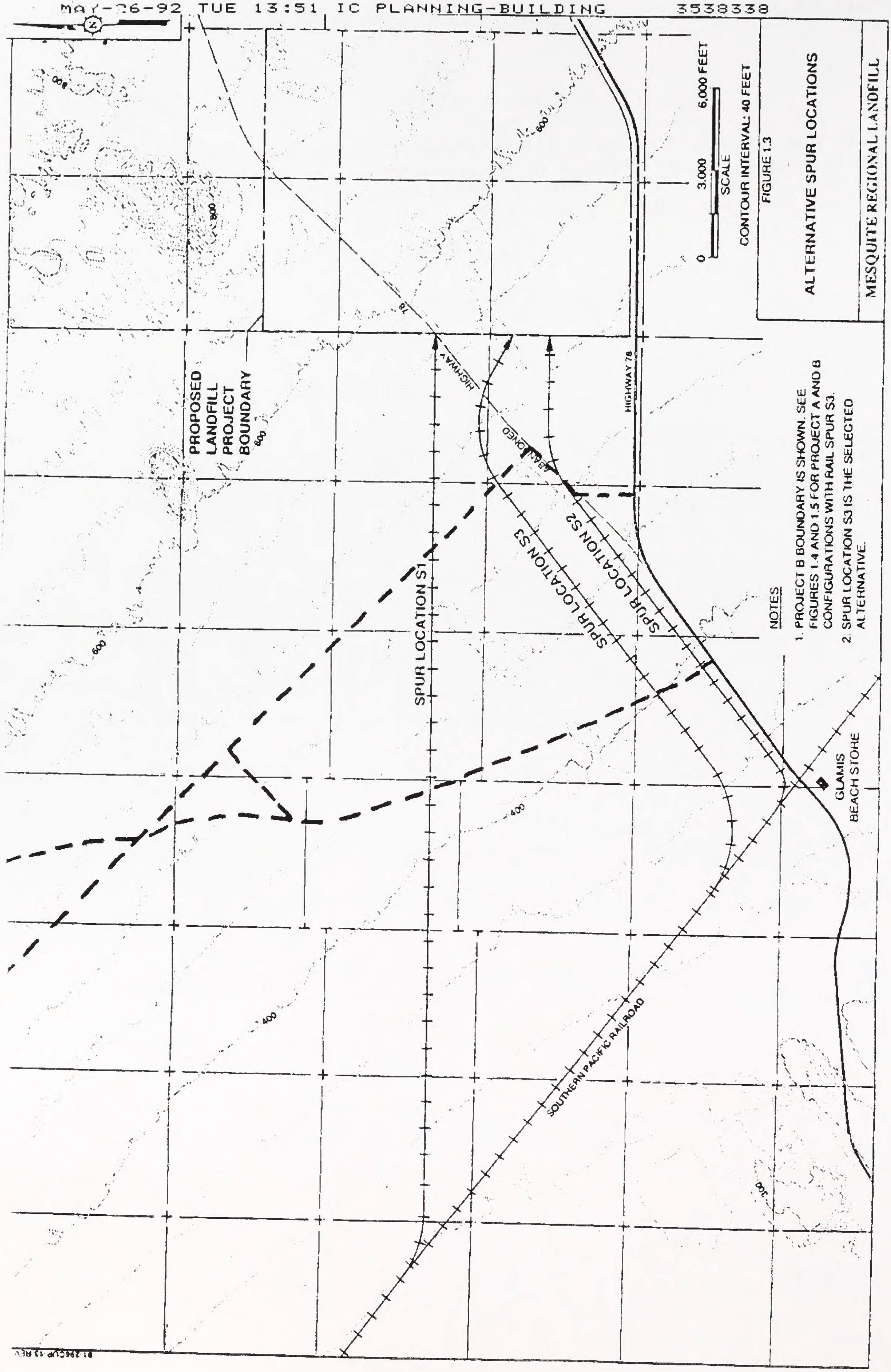
MAY 22 1992

I thank you for giving us the opportunity to review and comment on the proposal. Any future correspondence concerning the Arid Operations, Inc. landfill should be addressed to my Community Plans and Liaison Office (Code 3AQ).

Sincerely,

C. B. CHEATHAM
Colonel, U.S. Marine Corps
Commanding Officer

Encl:
(1) Site Map



NOTES

1. PROJECT B BOUNDARY IS SHOWN. SEE FIGURES 1.4 AND 1.5 FOR PROJECT A AND B CONFIGURATIONS WITH RAIL SPUR S3.
2. SPUR LOCATION S3 IS THE SELECTED ALTERNATIVE.

EXISTING ROADS — —

Items of concern to be addressed in the Draft EIR/S on the proposed Mesquite Regional Dump, in Imperial County. June 8, 1992 :

Will the applicants own and operate the materials recovery facilities (MRF's)? The separation of hazardous materials and recyclables is an integral part of this dump. Full disclosure of where garbage is separated should be discussed, at length, in the DEIR/S.

What types of chemicals are being used in the processing of ore, at the gold mine? And, include in the draft document, analysis of the cover material, at the mine, to ensure it is not hazardous, before this material is used to protect groundwater.

A waste management expert recently said, there is only room for two mega dump proposals, in the market place. There are six such proposals now for mega dumps. If there is only room for two, this intimates the so called "trash crisis" is a function of developers and government. Please discuss in detail, alternatives to landfilling of garbage. This does not mean alternative sites, or comparisons of reduced landfilling or no project alternatives.

What is the true analysis of air impacts to the Coachella Valley, with the combined Eagle Mountain dump, (if approved), and your dump ?

Is there a hydraulic connection between the dump or aquifer potentially affected by the dump and groudwaters beneath adjacent properties that could, at any time in the future, be used for domestic water supply purposes ?

Will the dump design (cap, liner, leachate collection-removal system, etc.) prevent leachate from being formed in the dump, and prevent leachate's leaving the dump through the liner system for as long as the wastes in the dump represents a threat to groundwater quality, (forever)?

How much leachate will be generated annually in the dump over the period during which the wastes represents a threat to groundwater ?

How will desiccation-cracks and differential-settling cracks in the cap of the dump be detected and remediated?

What will be the costs, and how and by whom will the costs be paid, for cap maintenance for as long as the wastes represent a threat to groundwater?

What will be the rate of leachate transport(gallons/acre/year) through the dump liner and out of the leachate collection and removal system at the time of construction? How will the leakage rates change over the time that the waste in the dump represent a threat to groundwater? What is the potential impact of such leakage on groudwater quality in the vicinity of the dump?

If incorporating a composite liner, what will be the potential impact of desiccation-cracking of the soil-clay layer of the composite on the rate of leachate transport? What is the anticipated area of the liner in which intimate contact between the FML and the soil-clay layer will not be achieved? What will be the impact on the rate of leachate transport of not achieving intimate contact between the FML and the soil-clay layer over that area ?

How will the problem of desiccation-cracking of the compacted soil layer of the composite liner be identified, and remedied? How will the desiccation-cracking that occurs affect leachate transport through the liner?

What is the expected composition of the leachate? What is the potential for each of the components to pollute groundwater in the vicinity of the dump, rendering it unusable or impaired for use as a domestic water supply ?

What is the potential for TCE and other chlorinated solvents in the proposed dump to pollute groundwater with known human carcinogens ?

What is the potential impact of any possible seismic activity that could occur in the vicinity of the dump on the dump structures? After a seismic event of any magnitude, how will the integrity of structures be examined and damage assessed before widespread groundwater pollution occurs? How will it be possible to make repairs on those structures when they are located beneath buried solid waste that may be hundreds of feet thick ?

What is the ability of groundwater monitoring system proposed to detect leakage from the dump liner before widespread groundwater contamination occurs ?

Can municipal solid waste leachate-contaminated aquifers be "cleaned up" to the point at which the groundwater and the aquifer can be used again for domestic water supply purposes ?

Will the consulting firm for the dump design and the EIR/EIS firm make a plausible worst-case scenario evaluation for the pollution of groundwaters by the proposed dump? Will you estimate the total cost of groundwater and aquifer clean-up to the extent that clean-up can be accomplished ? Who will pay these costs ?

What are officials in the local jurisdiction doing toward investigating and remediating current groundwater pollution from existing dumps, and toward preventing future groundwater pollution by dumps ?

How will the moisture content of the waste in the closed dump affect the rate of fermentation(gas production) and leaching contaminants from the waste ?

Will the garbage arrive compacted in the train containers ? If so, due to the combustibility of compacted garbage, you will need to "fluff" it up at the dump's working face. What is the realistic estimate of gases released unharnessed into the atmosphere ? What realistic health threats does this have on the public and the dump employees?

Include a water analysis profile of existing water wells in the vicinity of the proposed dump, as well as water wells downstream of the proposed dump. This is to include heavy metals, and other contaminating elements.

Please disclose any environmental infractions of Western Waste Industries, Gold Field Mining Company, and S.P. Environmental Systems, and subsidiaries. Also, include any criminal activities involving bid rigging, anti-trust suits, monopoly attempts, convictions. Also, please disclose the amounts of fines levied for such actions, and the actual amounts paid.

Does Imperial Valley have a "short-fall" of available dump space ? If not, what is the reason for potentially hosting Southern California's garbage? If the "host fee carrot" was removed from under the politician's nose, would there still be a "need" for this dump ?

Also, please include in the Draft EIR/EIS, the enclosed publications from G. Fred Lee & Associates. Also included,is Dr. Lee's credentials. We want this information included to enable the citizens of Imperial County to better judge this proposal with all of the facts at their fingertips. The publication are as follows :

1. Municipal Solid Waste Management : Long Term Public Health and Environmental Protection
2. "Dry Tomb" Landfills : A Technologically Flawed Approach for Protection of Groundwater Quality.
3. Landfills and Groundwater Quality Protection Issues.
4. Review of Proposed Landfills : Questions That Should Be Answered.
5. Municipal Landfill 30-Year Post Closure Care - A Myth
6. Landfill Post-Closure Care Funding
7. Comments on California Integrated Waste Management Board Proposal To Amend Title 14 California Code Of Regulations Division 7, Chapter 9 Governing The Siting Of Landfills.
8. Groundwater Pollution By Municipal Landfills : Leachate Composition, Detection And Its Water Quality Significance.
9. Eagle Mountain Landfill A Case Study of Landfill Siting Issues.
10. Groundwater Quality Monitoring at Lined Landfills : It's Time to Stop Deceiving Ourselves and the Public.
11. Draft Editorial : Cancer Risk and Ground Water Quality
12. "Safety" Of Landfills : A Groundwater Quality Perspective
13. Editorial MSWM By Lined "DRY TOBM" Landfills : A Flawed Technological Approach.

As mentioned earlier, the credentials of the author(s) is included. To ensure our questions from the Scoping Sessions, and our questions/comments here are included and addressed properly, we formally request you send a copy of the Draft EIR/EIS to the address below.

Larry and Donna Charpied
CITIZENS FOR THE CHUCKWALLA VALLEY (CCV)
P.O. BOX 321
DESERT CENTER, CA. 92239
(619) 392-4722

2000
Mesquite
Landfill

644 Gilmore
Brawley, Ca 92227
May 27, 1992

RECEIVED
BUREAU OF LAND MANAGEMENT
1992 MAY 29 PM 2:29
EL CENTRO RESOURCE AREA
EL CENTRO, CA

B L M's El Centro Resource area
333 S. Waterman Ave
El Centro, Ca 92243

Dear Sir:

I arrived in this Valley in 1932. It was a beautiful place and clear, clean air.

My husband I were especially fond of going out to the Glamis' Store before Glamis' became commercialized. It was peaceful there and the little Cemetery was kept nice.

Now the sand dune buggies and three wheelers tear up the sand dunes. The little Cemetery's original fence is down in places, although the is a chain link fence around that. Old flower pots on the graves.

All the above is leading up to the point that I am against bringing in trash from the coast. I am sure that in time it will

contaminate our soil and water.
It will certainly kill wildlife that
lives on the ground.

If these companies are allowed
to bring in trash it will just be
the beginning others will be bringing
in trash. I don't want Imperial
Valley to be a cesspool for the
big cities.

My hope is that the B.L.M. will
be able to stop this before it
gets started.

Thank you.

Yours truly.
(Mrs) Irene Bradford.

TO: Reference BLM-CA 29617 Area Manager
Bureau of Land Management
El Centro Resource Area
333 S. Waterman Ave.
El Centro, CA 92243-2298

RECEIVED
BUREAU [illegible]
1992 JUN 18 PM 2:48
EL CENTRO RESOURCE AREA
EL CE

From:Edith Harmon

Date:June 11, 1992

Re: Gold Fields/Mesquite Regional Landfill EIS/EIR Scoping Concerns

Page references are to the material handed out at the publicscoping meeting May 27, 1992.

WASTE STREAM:

From where will the waste come? 6/1/92 the U.S. Supreme Court issued a ruling stating that States cannot bar interstate transport of wastes to private landfills. Will wastes be imported from Los Angeles, Arizona, New Jersey or where?

Provide economic analysis and potential future demand for the landfill facility in light of the Wall Street Journal 6/2/92 article "Space Available: Economics of trash shift as cities learn dumps aren't so full: Recycling and incineration help increase leverage of hard-pressed towns". (Copy attached.)

The scoping information states that the proposed sanitary landfill would be classified as a Class III (non-hazardous) solid waste disposal facility, taking approximately 600 million tons of municipal solid waste during the active life of the landfill. The EPA estimates that 0.1 percent to 0.5 percent of the residential waste is classified as hazardous waste. What will happen to the 0.1% to 0.5% of the residential waste that the EPA estimates to be hazardous? The anticipated 20,000 tons/day of waste could include 20 to 100 tons/day of residential hazardous waste or 7,300 to 36,500 tons/year. Over the life of the project (600 million tons of MSW), at current EPA estimates there could be 600,000 to 3,000,000 tons of hazardous wastes brought to the landfill. How and where will these wastes be stored after removal to prevent the build-up of hazardous waste at he landfill site if it is not to be buried by daily cover? Or will they remain in the landfill?

Who will identify the hazardous waste? Who would certify residential refuse as free of hazardous wastes, if that is the case? With what frequency will refuse be checked for hazardous wastes? If hazardous wastes are to be removed at the landfill site, to what hazardous waste site will they be transported and with what frequency? Is it intended than the Westmoreland site will receive hazardous wastes or that the Mesquite project will also propose a hazardous waste facility near the landfill site?

LINERS AND LEACHATE COLLECTION SYSTEM:

What specifically is meant by a "specially designed impermeable liner" (p.3)? Is it intended to use a material made of a "new" compound not used as liners for other landfills? If the liner will not be HDPE, what will it be and how thick will it be? Who is the manufacturer of the intended liner material? When did this company first begin manufacture of the proposed liner material? At what other landfills has this material been used, (cities, counties, state)? In what years was the material first used at each of the sites identified? How large (acres and depth of landfill) were the landfill cells at each site, and what are the cell closure dates at each site? How will the ground be prepared before laying the liner? How will the liner be installed? How will the installed liner system be field tested in place to determine if there are any leaks prior to deposition of wastes? What materials would be used to cover the liner and what would prevent the these materials from causing small punctures in the HDPE layer under the weight of the landfill or earth moving equipment?

At present HDPE seems to be the landfill liner of choice at other sites. So questions will be asked about HDPE, but if another material is to be used for a liner, the same questions apply.

Who is the manufacturer of the HDPE proposed for use at this site? How has it performed at other sites? What is the manufacturing history of the HDPE intended for use at this site? When was it first developed? Have independent tests been performed on HDPE samples of test strips exhumed from the field to perform stress tests, permeability tests, and tests for chemical reactions to compare the long term field behavior of HDPE used in landfills to the original material to determine projected life and field behavior? If so what are the results of these laboratory tests, who performed them, where were the results published? Include such studies in the appendix to the environmental document for the proposed project.

According to one manufacturer there are many household chemicals that will degrade HDPE, permeating it, making it lose strength, softening it, or making it become brittle and crack under the weight of the landfill. Neither halogenated hydrocarbons nor aromatic hydrocarbons are compatible with HDPE. Additionally some common household materials such as cider, lard, vinegar, margarine, shampoo, iodine, shoe polish, soap, etc. can cause stress cracks. Some household toiletries and pharmaceuticals that can permeate through HDPE are lighter fluid, nail polish, shoe polish, turpentine, orange oil, pine oil, in addition to numerous industrial chemicals. How would it be possible to keep household materials (many of which are non-hazardous) which are incompatible with the HDPE liners out of landfills? Given the potential for chemical interactions of materials under pressure, with time and heat, why wouldn't there be additional potential for chemical interactions between landfill constituents and the liner materials? To what extent are chemical interactions with liner systems responsible for lined landfill failure acknowledges by EPA? (See Rachel's Hazardous Waste News #117 for discussion of industry review of vulnerability to chemicals in household wastes.)

What is the estimated weight (pounds/sq.inch) on the bottom landfill liner if the landfill reaches a height of 400 ft as was originally proposed to the Board of Supervisors in Dec. 1991? What is the likely future performance of a HDPE (or other material) liner whose integrity has been compromised by exposure to aromatics and leachate containing materials known to cause stress cracks and/or permeate through the HDPE? What stress tests of compromised liner materials been performed which would simulate possible conditions under the pressure of 400 ft of materials 100 or 200 years from now? Who performed such tests and were they industry funded or independent? Results of tests on the liner materials should be included in the document appendix. What about performance of structural materials following seismic events which could be expected during the next several hundred years when leachate releases may pose a problem?

The following documents by U.S. EPA which, in part, discuss EPA's concerns about solid waste management facilities based on numerous studies funded by the EPA offer a point of view much different than the assurances offered by project proponents at the scoping meeting. EPA concerns must be addressed. Documents are: (1) U.S. EPA. Federal Register Vol. 53, No. 168. Aug. 30, 1988. Part III, Environmental Protection Agency. 40 CFR Parts 257 and 258, Solid Waste Disposal Facility Criteria; Proposed Rule. (pp. 33314-33422)., and (2) U.S. EPA. Federal Register Vol. 56, No. 196. Oct. 9, 1991. Part II, Environmental Protection Agency. 40 CFR Parts 257 and 258, Solid Waste Disposal Facility Criteria; Final Rule. (pp. 50978-51119).

EPA acknowledged potential problems with risk-based assessments based on computer models by noting that:

> Caveats to the risk and resource damage analysis and results presented in the risk assessment need to be recognized. First, the risk and resource damage modeling includes considerable uncertainty. The model components that introduce the most uncertainty are those that predict leachate quality for trace organics, the probability and consequences of containment system failure, and the human health risk resulting from exposure to toxic substances (e.g. the dose-response models). (FR '88, p. 33319)

Additional EPA concerns about landfill leachate noted that:

> Routine maintenance of the integrity and effectiveness of the final cover [during the first 30 years of post-closure care], proposed in Sec. 258.31 (a)(1), is necessary to prevent liquids from penetrating into the closed landfill and creating the potential for leachate migration. Required activities include repairs to the final cover to correct the effects of settling, subsidence, erosion, or other events, and preventing run-on and run-off from eroding or damaging the cover. Cover maintenance also includes periodic cap replacement, which is necessary to remediate the effects of routine deterioration. These activities are intended to promote the Agency's overall goal of minimizing liquids in landfills and are the minimum steps the Agency believes are necessary to protect human health and the environment in the long term. (FR '88, p. 33344)
>
> Experience has shown that leachate generation in landfills continues long after closure. Therefore, to avoid leachate collecting on top of the liner and causing the "bathtub effect," the owner or operator must continue to remove leachate from the collection system during the post-closure care period until leachate no longer is collected in the system. (FR '88, p. 33344)
>
> Long-term monitoring is essential to detect releases [of leachate] due to design or operating errors (e.g., tearing of liners or disposing of wastes that are incompatible with the liner and routine deterioration of the liner. Particularly for landfills designed with advanced containment systems (e.g., liners, leachate collection systems, or synthetic final caps), ground-water contamination may be delayed for many years, thus increasing the need for long-term monitoring. Because ground-water monitoring wells are subject to routine deterioration, post-closure activities also should include periodic replacement of these wells as needed. (FR '88, p. 33344)

The EPA acknowledged that:

> even the best liner and leachate collection systems will ultimately fail due to natural deterioration, and recent improvements in MSWLF containment technologies suggest that releases may be delayed by many decades at some landfills. For this reason, the Agency is concerned that while corrective action may have already been triggered at many facilities, 30 years may be insufficient to detect releases at other landfills. .... Finally, in the absence of sufficient data to follow [sic] the Agency to predict with certainty when containment systems are likely to fail, a second phase of reduced post-closure

> care ensures that releases will be detected while minimizing costs to the regulated community. (FR '88, p. 33345)

Additionally, "The Agency recognizes that the final cover will not stop leachate from migrating to the aquifer, but the final cover will minimize the amount of water that moves through the waste into the aquifer." (FR '88, p.33360) FR discussions and those in Rachel's Hazardous Waste News letters are not reassuring.

What will be the area covered by each landfill cell? Will cell construction commence at the center of the site and move toward the periphery, or will cell construction begin toward one edge of the landfill site and move sequentially toward the opposite side? In other words, will the oldest part of the landfill be in the center or at the periphery?

If the liner does not perform as the operator expects, and rather performs as EPA expects and eventually deteriorates allowing leachate release, how will clean up be performed? How would it be possible to repair a damaged liner under 400 ft of landfill? Will a post closure care period of 60-80 years be provided to accommodate EPA concerns about delayed leachate release following landfill closure? How would the liner cap be maintained to compensate for landfill settling with time? What are the projected long-term maintenance costs of the liner systems, caps, monitoring system and leachate collection system? These questions call for a full-scale engineering study because of the volume, height, weight, and composition of materials in the proposed landfill.

Of what materials will the leachate collection system be made? Who is the manufacturer, and what is the manufacturing and performance history of the materials used for leachate collection? What are the results of studies done to determine chemical sensitivities and incompatibilities of materials in the leachate and the various components of the system that will have direct contact with leachate?

EPA has acknowledged problems with the leachate collection systems based on the fact that all landfills contain a certain amount of moisture, that such moisture is indeed necessary for landfill decomposition, and that it is not possible to exclude all sources of moisture from municipal solid waste. EPA discussion follows:

> Section 258.28 Liquids Restrictions prohibits:
> disposal of bulk and noncontainerized liquid wastes in MSWLFs with two exceptions: (1) The waste is household waste (other than septic waste) and (2) the waste is leachate or gas condensate that is derived from the MSWLF..." (FR '91, p. 51007) Containers of liquid waste could be placed in MSWLF units only when the containers: (1) Are small containers of the size typically found in

> household waste, (2) are designed to hold liquids for use other than storage, or (3) hold household waste. (FR '91, p. 51007)

> The problems associated with the landfill disposal of containerized liquid wastes arise upon the eventual deterioration of the waste container. Liquids escaping from leaking containers will migrate to the bottom of the landfill acting as a transport and leaching medium for the wastes contained in the landfill. Liquids accumulating on landfill liners can contribute to liner failure through increased hydraulic pressure and/or chemical interactions. Increased hydraulic head due to liquid accumulation can increase the amount and rate of contaminant movement from the landfill to the ground water. Additionally, when waste containers degrade, allowing their contents to escape, they collapse under the pressure of the landfill. This situation can create voids in the landfill, which can lead to slumping and subsidence of the final cover. Once the integrity of the landfill cover is lost, infiltration of precipitation will increase, contributing to the leachate generation in the landfill. Collapse of deteriorated waste containers and subsequent damage to the cover material could occur after the post-closure care period of the landfill, when ground-water monitoring systems are not maintained to detect groundwater contamination. (FR '88, p. 33340)

> The Agency [EPA] recognizes that landfills are, in effect, biological systems that require moisture for decomposition to occur and that this moisture promotes decomposition of the wastes and stabilization of the landfill. (FR '91, p. 51055) The wastes received at landfills already contain moisture (10 % to 35% by volume), and more is added by rainfall and by the decomposition process itself. (FR '91, p. 51055)

"Household [liquid] waste (other than septic waste) is exempted because it is beyond the practicable capability of owners and operators to effectively restrict the disposal of all household liquid waste." (p. 33340)

> The Agency recognizes that there are potential operational problems associated with leachate and gas condensate recirculation that may result in adverse impacts on human health and the environment. These problems include: (1) An increase in leachate production, (2) clogging of the leachate collection system (LCS), (3) buildup of hydraulic head within the unit, (4) an increase in air emissions and odor problems, and (5) an increase in the potential of leachate pollutant releases due to drift and/or run-off. (FR '88, p. 33341)

Following this list in discussion Sec. 258.28 in the Final Rule, EPA concludes that these potential problems "may result in adverse impacts on human health and the environment." (FR '91, p. 51056)

The EPA reported that: "Existing information on MSWLF leachate indicates that leachate from MSWLFs generally contain a wide range of organic and inorganic hazardous constituents in varying concentrations." (FR '88, p. 33318)

What actions and/or monitoring (in specific detail) is proposed to prevent clogging of the buried leachate collection system? What is the thickness of the materials used for the leachate collection system? Why wouldn't they be expected to clog or collapse or deteriorate under the weight to the accumulated landfill at closure or post closure in combination with potential deterioration caused by chemical reactions of the leachate collection materials in response to chemicals present in the leachate? Have portions of leachate collection systems been exhumed from failing landfills and tested to compare the field behavior of the materials to samples of the same materials manufactured at the same time? What are the results of such tests? Cite the published results.

How will the leachate collection system be cared for and monitored both during the active life of the landfill and during the extended period of post closure care? What will be done to prevent clogging? If clogging or collapse of portions of the leachate collection system occur during the active life or during post closure, how will they be repaired? How is it possible to repair or reinstall a new leachate collection located under tons and hundreds of feet of landfill materials? Will portions of the system need to be excavated (along with the landfill overburden) to repair the damaged collection system? If so, where will materials be placed?

Are there any other existing, functional 20,000 ton/day landfills currently operational with liner and leachate collection systems identical or similar to those proposed? If so, where are they located, and when did operations commence? Are the landfill cells at those landfill sites to be of comparable area and with a comparable depth at closure? If so, at which sites? Does Western Waste operate any of these 20,000 ton/day sites? If not, what companies are currently operating such sites? What is the performance record of such mega landfill sites?

GROUNDWATER MONITORING SYSTEM:

Is the aquifer underlying the proposed landfill site alluvial fill or fractured rock? County Board of Supervisors have been very interested in potential future exploitation of the groundwater resources of the "East Mesa". What is the hydrogeologic relationship between the portion of the aquifer underlying the proposed project site and the groundwater resources of the remainder of eastern Imperial County between the irrigated portions of the County served by IID and the mountains/Colorado River? What would be the potential consequences of the migration of a plume of contamination resulting from the eventual failure of the containment system from a landfill of this size? How would such an event impact the future potential uses of the groundwater resources on the East side of the County? What are potential costs for cleanup? What are potential costs for cleanup, and how will cleanup be accomplished? What criteria will be used to determine the success of any remedial action or clean-up? Will there be certification by an independent, qualified groundwater scientist?

What are the specific details of the groundwater monitoring system? Where will monitoring wells be sited, and at what point during the life of the landfill? What procedures will be employed when the landfill eventually fails as expected by EPA? Will groundwater monitoring wells be replaced on a regular schedule? If so, how frequently? If not, what criteria will be used to determine when monitoring well replacement it required? Will replacement monitoring wells be located in the immediate vicinity of the well to be replaced? If not, what criteria will be used to determine the location of any replacement wells? What is the estimated cost for monitoring and replacement wells for the active life of the landfill and for a 60-80 year period of post-closure monitoring?

Monitoring will become more important during the post closure period. What frequency of monitoring will be maintained? Will water samples be taken to an independent state or federally licensed laboratory for analysis? How will water samples be obtained? Will samples be collected by independent personnel, or by the operator? To what agencies will monitoring data be supplied, and who or what agencies will analyze that monitoring data? Will all monitoring data be available for public review? If so, at what locations? If not, why not?

GROUND/SURFACE WATER USAGE:

Will water be used for control of dust and airborne particulates raised during daily operations? Will access to the active portions of the landfill be over paved roads or over gravel/dirt roads? If over unpaved roads, will water be used for dust control, or will some other substance be used? If water, how much and from what source? Quantity/day, quantity/ year, quantity over the 100 year life of the proposed landfill? What are projected short and long-term impacts on the water resources?

What will be the crushing effects of the heavily loaded vehicles travelling to and from the active face of the landfill to deposit trash? What will be the added PM10 impacts, particularly during periods of high winds? If water is used for dust control, for transport, how frequently will it be applied? How many truck trips are anticipated from unload points to trash deposit on the landfill site?

Will water be used for wet-down after the daily cover of 6 inches of material is added daily to the active face of each cell? If water is used, how much is required for daily cover wet down, and from what source will that come? How long will it take to wet down the daily cover? Will wet down be required during daily operations? What is the anticipated total water requirement for daily cover wet down daily, annually, over the 100 life of the landfill? What will be the impacts of the use of this quantity of water on the surface water or groundwater resources at the site of origin?

What are the anticipated quantities of water required for revegetation and reclamation of the landfill site after the closure of each cell? What is the nature of the proposed revegetation irrigation system, for how long will it be required (up to 5 years or longer?) for successful revegetation? What criteria are to be used to constitute successful revegetation? Who will monitor and certify that revegetation is successful, what vegetation density and what diversity of plant species?

Please prepare a table indicating ALL water requirements through to termination of post-closure care requirements indicating: daily, annually, over the 100 year life of the landfill, and including the post-closure care period. The table should include a breakdown of water requirements for transportation dust control, wet down of daily cover, and water requirements for revegetation...and any other water requirements anticipated. If groundwater resources are anticipated to be used, from what source? Will groundwater be taken from the same aquifer being currently used by Gold Fields mining operations? What are current groundwater requirements for the gold mine, daily, annually? What additional groundwater usage is anticipated by the projected future life of the mining operation? What will be the cumulative impacts of groundwater usage for mining in addition to that required by the proposed landfill? If a second 20,000 ton/day landfill is approved, what will be the cumulative impacts of water requirements for both landfills and for the mining operation? If Colorado River water is to be used, how will this impact the agricultural allocation for IID users?

BIOLOGICAL IMPACTS:

How will the water requirements for landfill sites (one or the proposed two) impact the future growth potential for Imperial County? What is the anticipated water level declines as a result of additional groundwater usage for landfill operations. Give projections for impacts of one landfill, and for two landfills since two are being proposed simultaneously. What will be impacts of projected water level declines on native vegetation? Biological resources in desert areas have very critical requirements and once water levels decline beyond the root zone of deep rooted trees, they die, thereby changing the microclimate for other plant and animal species in the vicinity. Please address these issues.

How will the noise, dust and vibrations of the activities of the proposed project in addition to those of the existing mining operations impact the mating and reproductive behaviors of animal populations in the area? What will be the potential impacts of additional ravens attracted to the landfill area have on survival of desert tortoises and other animal populations in the vicinity? How will the closure cap be protected from the activities of burrowing animals which could result in compromised integrity of landfill cap and slope faces?

Will revegetation be done with native species grown from seed collected on site prior to disturbance of the area? Will seed be direct sown and later watered, or will the area be revegetated with nursery plants grown from seeds collected at the project site? Will revegetation of the site be done with an attempt to restore the species diversity in the approximate relationship as exists pre-project disturbance? How will plants be watered and for what period of time? Will plant losses be replaced with subsequent plantings or sowings of seed, if so at what intervals? What criteria will be used to determine the success of revegetation, species diversity, densities similar to off site terrain, age classes of vegetation? Who will monitor to assess revegetation success, and for what period of time and with what frequency? What are the anticipated costs/acre for revegetation? What criteria will be used to determine success of measures to mitigate impacts on wildlife? How will monitoring be done and by whom, and with what frequency?

WEATHER DATA AND CLIMATE:

Please prepare tables showing weather data, rainfall and wind conditions not only from the mining site, but from all sites within 30 miles that report to NOAA to determine the possible range of seasonal or 100 year rainfall events which may be possible in that part of the County and which might reflect possible maximum 24 hour or maximum storm cycle rainfall events which could add moisture to the active face of the landfill.

LIGHTNING:

What measures will be taken to protect the landfill site from lightning strikes in order to reduce potential for gas explosions and closure cap integrity from direct lightning strikes post-closure?

DEMOGRAPHIC PROFILE OF THE COUNTY:

To be consistent with pending legislation (AB 3024), prepare a table to compare Imperial County with the rest of the State of California, showing race and ethnic composition of the population, primary language spoken by percentage, percentages of persons under 5 years of age and over 65 years of age, education level, economic information including average income, income range and numbers of the population within each range, percentage of population unemployed, and percentage of the population below poverty level. If it is asserted that Imperial county is not being targeted because of educational, ethnicity, language and income levels, explain why not.

P.3,4 cite "potential benefits" to the County, but what are the potential liabilities to the County as it gets the reputation as a place to send refuse considered undesirable by more affluent and better educated communities? What are the economic, social, and environmental impacts as resources and labor are diverted to landfill operations? What will be potential impacts of the proposed project on the recreational desirability of the area and on long term winter visitors to the County?

Will the Draft EIS/EIR be available in Spanish for those with limited English skills and for Mexican officials and agencies that must be provided documents in accordance with the 1983 La Paz agreement? Will those documents be provided in a timely manner to accord Spanish speakers with the full amount of time to submitting comments in response to the Draft EIS/EIR?

PAYMENTS PRIOR TO PROJECT APPROVAL:

Don't pre-draft EIS/EIR negotiations and acceptance of financial payments by project proponents/operator constitute an agreement and/or expectation of prior approval of the proposed landfill project? If not, why not? How will changing public perceptions in this regard impact the project?

cc:
Imperial County Public Works Dept.

WALL ST. JOURNAL

6-2-92... 75 CENTS

Space Available

Economics of Trash Shift as Cities Learn Dumps Aren't So Full

Recycling and Incineration Help Increase Leverage Of Hard-Pressed Towns

Court Ruling Adds to the Mix

By JEFF BAILEY

Staff Reporter of THE WALL STREET JOURNAL

Like many Americans, Robert Mehegan, a Boston public works executive, had been hearing about a national garbage crisis for years, with the dwindling availability of landfills inexorably driving the cost of garbage disposal skyward. So he was startled last year when bids for the city's garbage contract actually dropped from $70 to $50 a ton, saving Boston taxpayers $7 million a year.

Mr. Mehegan, along with counterparts in Philadelphia and Cleveland, is reaping the benefits of increased competition in the estimated $25 billion-a-year waste industry. All three major waste disposal companies showed newfound aggressiveness in bidding for the Boston contract. Contrary to dire predictions, dump capacity is increasing, fostering lively price competition that could save American cities hundreds of millions of dollars.

Yesterday, the Supreme Court issued a ruling likely to further fuel competition, stating that states can't bar interstate waste shipments. (See story on page A3.) That should further embolden cities, which already are taking advantage of the new environment by demanding deep rate cuts, banding together to increase public-sector leverage over dump prices, and building new dumps of their own and expanding old ones to bypass more expensive private landfills.

High Stakes

Philadelphia and Cleveland joined Boston in recently hammering out long-term contracts that lowered their disposal costs by more than 20%.

It's true, many dumps have been closing, but they've been the tiny ones. The lost space has been more than offset by a handful of huge, new waste sites. At the same time, increased use of incineration, recycling and, more recently, the effects of the recession have combined to cut more deeply than anticipated into the nation's refuse that must go to dumps.

The stakes in the disposal price war—fought mostly between big municipalities and a handful of companies led by Waste Management Inc., Browning-Ferris Industries Inc., and Laidlaw Inc. — are huge. The nation generates about 180 million tons of trash a year. Should it cost $10 a ton to dump, as it does in San Jose, Calif., or $131 a ton, the sum Morris County, N.J., pays to have its rubbish trucked to Pennsylvania?

If those were average national dump prices, the range would be between $1.8 billion and $23.6 billion. (The actual total is probably between $5 billion and $6 billion; most of the rest of the industry's revenue comes from hauling fees.)

For most of the last 20 years, the big garbage companies have been gaining the upper hand, grabbing more than half the market. The lowly dump, with its operating profit margins (before taxes and corporate overhead) of 50%, turned garbage companies into glamour stocks. Lofty stock prices financed acquisitions, which brought growth that sent the stocks still higher.

Huge New Sites

That rise was fueled, in part, by the widespread perception that dump capacity was shrinking. All the while, many municipal officials remained ignorant about the economics of trash. "It was easy in the 1970s not to deal with the issue because the average [monthly] household bill was $5," says Gary Brayton, a garbage consultant at Deloitte & Touche. "Now it's $30 to $40 in some areas. It's a significant cost to citizens."

Just about the time those prices were jarring many municipalities toward action, along came the "garbage crisis." It sounded true enough. Dump closings created pockets of scarcity, and opening new dumps had grown difficult. The very local nature of the business meant that few officials knew much about the trash market beyond their own backyard.

Then, in 1987, the idea of a crisis was fixed in the national consciousness as a barge heaped with 3,186 tons of New York state garbage drifted hopelessly for five months in search of a dump. Rejected by dumps and incinerators in nine locations along the Atlantic coast and in the Caribbean, the trash returned to New York state and was burned.

Suddenly, dump fees were like oil prices in the late 1970s—unbelievably high but certain to go higher.

Handy Concept

The garbage companies didn't invent the notion of a capacity crisis, but it has worked to their advantage. And efforts to perpetuate it continue. The National Solid Waste Management Association issued a report last month declaring that "landfill capacity in North America continues to decline." In an accompanying press release, the trade group warned that "escalating disposal costs will continue" unless siting new dumps becomes easier.

However, one of the report's authors, Susan K. Sheets, says she doesn't believe capacity is declining and says that the association's public-relations person was

Please Turn to Page A6, Column 1

Exhibit F

RECEIVED
1992 JUL 15
EL CENTRO

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, Ca. 94105-3901

July 10, 1992

Ben Koski, Area Manager
Bureau of Land Management
El Centro Resource Area
333 S. Waterman Avenue
El Centro, CA 92243-2298

Re: BLM CA-29617

Dear Mr. Koski:

The U.S. Environmental Protection Agency (EPA) has reviewed the **Notice of Intent to prepare an Environmental Impact Statement/Environmental Impact Report (EIS) for a Proposed Right-of-Way and Land Exchange for Proposed Mesquite Regional Landfill, Imperial County, California.** Our review is provided pursuant to the National Environmental Policy Act (NEPA) and the Council on Environmental Quality Regulations (40 CFR Parts 1500-1508).

The scope of subjects that should be included in the EIS is described in the enclosed comments. Topics include water resources, air quality, vegetation and wildlife, permits and regulatory issues, landfill siting and design, corrective action, closure, and post-closure care.

We appreciate the opportunity to comment on the proposed project and request three copies of the draft EIS when it is completed. If you have any questions, please contact me at (415) 744-1584, or have your staff contact Jeanne Dunn Geselbracht at (415) 744-1576.

Sincerely,

Jacqueline Wyland, Chief
Office of Federal Activities

Enclosures

001620/92-178

cc: Imperial County APCD

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General Comments

The proposed land exchange is for the express purpose of providing a site for operation of a municipal solid waste landfill. The EIS should address the potential direct, indirect, and cumulative impacts of the land exchange, including all potential impacts of the planned landfill. The EIS should discuss mitigation measures necessary to ensure protection of resources and compliance with applicable environmental laws and standards. We urge BLM to consider including all necessary mitigation measures as well as closure and post-closure requirements as conditions of the land transfer agreement to Gold Fields Mining Company, Western Waste Industries, and S.P. Environmental Systems (Partnership).

The EIS should thoroughly describe and assess impacts to the land and resources that would be offered to BLM in exchange for the Project A or Project B sites.

Facility Siting and Design

The landfill would be subject to the Solid Waste Disposal Facility Criteria (40 CFR Part 258), which include location restrictions, operating criteria, design criteria, and financial assurance criteria, as well as provisions for groundwater monitoring, corrective action, closure, and post-closure care. The EIS should discuss how these criteria would be met.

The EIS should describe the design and operation of the planned landfill and identify applicable permits and regulatory requirements. Please see the enclosed "Municipal Solid Waste Landfill Project Description" for an outline of issues that should be addressed in the discussion of design and operation of the facility.

The EIS should discuss the process by which Mesquite Mine overburden and ore residue would be prepared for use as daily cover at the landfill. The impacts of crushing as well as the size and sorting requirements for daily cover should be identified. Leach tests and neutralization procedures required to ensure against acid drainage should be discussed.

The EIS should discuss the source of the waste to be disposed at the proposed landfill, including waste generated at the Mesquite Mine. A thorough assessment of all transfer stations and the waste loading and unloading areas should be provided.

Geology and Water Resources

The EIS should describe the geology, hydrogeology, geomorphology, soil characteristics, geotechnical properties of foundation and other landfill supporting materials, regional seismicity and faults, and seismic stability in the vicinity of the site. The discussion of hydrogeology should include such characteristics as depth to groundwater, confined or unconfined conditions, hydraulic conductivity, storage coefficient, aquifer thickness, and estimates of groundwater gradients, directions, and velocities. All existing wells in the vicinity should be identified. Existing water quality should be provided as a baseline for comparison with the proposed action.

The EIS should discuss the potential impacts of the landfill on the quality and quantity of groundwater and surface water. The discussion should include impacts of topographic changes to drainage patterns, springs, and wetlands; denied groundwater recharge beneath the site in conjunction with any dewatering of the Mesquite Mine; seepage of leachate into groundwater; and storm water discharge; and the potential for releases of hazardous or toxic substances.

The EIS should discuss the onsite treatment plant, which according to the scoping notice, would treat "water that occasionally reaches small uncovered trash working areas."

The EIS should discuss the cumulative impacts of the extensive flood diversion system that has been constructed for the Mesquite Mine and would be expanded for the proposed landfill.

The EIS should discuss groundwater monitoring and contingency plans and corrective action for releases of leachate.

Air Quality

The EIS should describe existing air quality in the vicinity of the proposed site. The EIS should discuss the National Ambient Air Quality Standards (NAAQS) and Prevention of Significant Deterioration (PSD) increments applicable to air quality in the project area. PSD increments exist for sulfur dioxide, total suspended particulates, and oxides of nitrogen. Discuss impacts to the NAAQS, PSD increments, and the Imperial Valley non-attainment area for PM10 (particulate matter smaller than 10 microns) and transitional area for ozone, considering all aspects of landfill operations. BLM should coordinate with the

Imperial County Air Pollution Control District (APCD). The EIS should also discuss whether a New Source Review permit is required and, if so, what it would involve.

PSD increments are highly protective of air quality in Class I areas such as wildernesses and national parks. The PSD increments for total suspended particulates are 5 $\mu g/m^3$ (annual) and 10 $\mu g/m^3$ (24-hour). The EIS should identify any Class I PSD areas located within at least 100 kilometers of the proposed project site. We recommend that BLM consult with the U.S. Forest Service and the National Park Service for a determination of which areas could be adversely affected by the proposed action. Potential impacts to Class I PSD areas, including visual impacts, should be discussed.

The EIS should discuss how the proposed project would meet the conformity requirement as defined in the Clean Air Act, as amended. Section 176 of the Clean Air Act prohibits any Federal agency from taking any action that causes or contributes to violations of standards in any area, increases the frequency or severity of any existing violation of any standard in any area, or delays timely attainment of any standards or any required interim emission reduction or other milestones in any area. Imperial County is currently preparing a State Implementation Plan (SIP). BLM should coordinate with the Imperial County APCD to determine conformity and develop mitigation measures necessary to comply with NAAQS and PSD.

Vegetation and Wildlife

BLM should work closely with the U.S. Fish and Wildlife Service and the California Department of Fish and Game to determine potential impacts of the landfill on plant and wildlife species, especially species classified as rare, threatened, or endangered on either state or federal lists. Information on candidate species should also be provided. The EIS should also discuss the potential impacts of invasive or opportunistic species such as starlings and cowbirds as a result of disturbances by landfill activities. The potential for secondary adverse impacts to existing wildlife by these species should be evaluated.

The EIS should discuss avoidance, minimization, and mitigation of losses or modification of habitat and plant and animal species composition.

Closure and Post-Closure Care

The EIS should discuss closure and post-closure care of the facility and identify the criteria that would be used to determine successful closure and reclamation of the site. The EIS should also indicate whether the landfill would be reclaimed for recreation or other public purposes after closure pursuant to 43 CFR 2741.5(i).

Cumulative Impacts

The EIS should discuss the cumulative impacts of other projects in the vicinity, including the Mesquite Gold Mine, the gravel borrowing operations, the Chocolate Mountains Aerial Gunnery Range, recreational activities in the Imperial Sand Dunes Recreation Area. In addition, the EIS should discuss whether the plan of operation for the Mesquite Mine would need to be revised.

SUMMARY OF NOI RESPONSES

Comment No.	Commentor -- Date of Letter NOI Comment	Category	EIS/EIR Section/Remarks
	The Wilderness Society -- May 18, 1992		
1.	Depositing MSW in existing pits should be considered as an alternative project.	B	Alternatives.
2.	To what extent will the liner leak, and what will be the impacts?	A	Geology/Soils/Mineral Resources, Water Resources/Environmental Health & Public Safety.
3.	The EIS/EIR must compare the socioeconomic impacts of turning the area into an industrial park versus recreation, open-space, tourism and wildlife habitat.	A	Socioeconomics.
4.	The EIS/EIR must be clear on tortoise/wildlife habitat reduction as a result of land exchange.	A	Biology.
5.	The EIS/EIR must consider all cumulative impacts to plants, animal, recreational, aesthetic, and cultural resources from project on private, federal, and state lands in region.	A	Throughout EIS/EIR, as appropriate.
	Irene Bradford -- May 27, 1992		
6.	She is against bringing in trash from the coastal cities.	N/A	Comment noted.
7.	She believes that in time the project will contaminate the soil, water, and kill wildlife.	A	Water Resources/Biology.
8.	Believes if Mesquite Landfill is approved, it will allow other landfills into the Imperial Valley area and create a cesspool.	N/A	Comment noted.

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N/A = Not Applicable

SUMMARY OF NOI RESPONSES

Comment No.	Commentor -- Date of Letter	Category	EIS/EIR Section/Remarks
	NOI Comment		
	Imperial County Fish & Game Commission -- May 27, 1992		
	Mitigation requests to be considered:		
9.	• Implementation of CDFG guidelines for Burro Deer Herd Management Plan and water source development at 6 mile intervals.	A	Biology.
10.	• Participation in 3 year (1991 - 1993) Ecology Study of Desert Dwelling Bighorn Sheep in southeastern Imperial County.	C	Bighorn sheep would not be significantly impacted by the Proposed Action.
11.	• Participation in studies and evaluations of wildlife management and maintenance programs for various impacted local species.	A	Biology.
	Edith Harmon (Telephone conversation) -- May 28, 1992		
12.	Requested the full name & address of a speaker (Mr. Berryman). She was given information from sign-in sheet from Town Meeting.	N/A	BLM provided name and address.
13.	She would like to see Assembly Bill 3024, addressed.	A	Socioeconomics.
	Citizens for the Chuckwalla Valley -- June 8, 1992		
	Items of concern to be addressed in the Draft EIS/EIR:		
14.	• Will the applicant own and operate the materials recovery facilities (MRF)?	A	Purpose & Need, Project Description.
15.	• What types of chemicals are being used in the processing of ore at the gold mine? Will the cover material protect groundwater and is it safe?	A	Water Resources.
16.	• Please discuss the alternatives to landfilling of trash.	A	Alternatives.
17.	• What would be the combined effects on air quality to Coachella Valley if both Eagle Mountain and Mesquite are both approved?	A	Air Quality.

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SUMMARY OF NOI RESPONSES

Comment No.	Commentor -- Date of Letter NOI Comment	Category	EIS/EIR Section/Remarks
	Citizens for the Chuckwalla Valley -- June 8, 1992 (continued)		
18.	• Could the landfill contaminate ground water beneath adjacent properties that may be used for domestic water supplies in the future?	A	Water Resources.
19.	• Will the landfill design prevent leachate from being formed or leaving the dump to contaminate groundwater?	A	Water Resources, Project Description.
20.	• How much leachate will be generated annually during the period in which it represents a threat to groundwater?	A	Water Resources.
21.	• How will desiccation-cracks and differential-settling cracks be detected and remedied in the landfill cap?	A	Project Description.
22.	• What will be the costs, and how and whom will the costs be paid for the landfill cap maintenance to protect groundwater?	A	Socioeconomics.
23.	• What will be the gallons of leachate/acre/year transported through the liner at the time of construction? How will it change over the time that the dump is a threat to groundwater? What is the potential impact to groundwater in vicinity of dump?	A	Water Resources.
24.	• What will be the potential impact of desiccation-cracking of the soil-clay layer of the composite liner on the rate of leachate transport?	A	Water Resources.
25.	• What is the anticipated area of the liner in which intimate contact between the FML and the soil-clay layer will not be achieved?	A	Project Description.
26.	• What will be the impact on the rate of leachate transport of not achieving intimate contact between the FML and the soil-clay layer over that area?	A	Water Resources.
27.	• How will desiccation cracking of the compacted soil layer of the composite liner be identified, and how will this affect leachate transport through the liner?	A	Water Resources.

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SUMMARY OF NOI RESPONSES

Comment No.	Commentor -- Date of Letter NOI Comment	Category	EIS/EIR Section/Remarks
	Citizens for the Chuckwalla Valley -- June 8, 1992 (continued)		
28.	• What is the expected composition of the leachate, and can these components pollute the groundwater?	A	Water Resources.
29.	• Could TCE and other chlorinated solvents pollute groundwater?	A	Water Resources.
30.	• Could any seismic activity in the area affect the integrity of the dump structures? How will repairs be made to protect groundwater?	A	Geology/Soils/Mineral Resources.
31.	• Can the groundwater monitoring system detect leakage before widespread groundwater contamination occurs?	A	Water Resources.
32.	• Can leachate contaminated aquifers be cleaned up to make them safe for domestic purposes?	A	Water Resources.
33.	• Will the dump design have a worst-case scenario for the pollution of groundwaters by the proposed dump?	A	Project Description. Water Resources.
34.	• What would be the cost of clean-up and who would pay for it?	A	Socioeconomics.
35.	• Are local officials investigating and remediating current groundwater pollution from existing dumps, or looking for ways to prevent future groundwater pollution?	C	Not to be included in the EIS/EIR.
36.	• How will the moisture in closed dump affect rate of gas production and leaching contaminants?	A	Water Resources, Air Quality.
37.	• Will garbage be compacted in train containers, and will it release gasses into the atmosphere to harm the public and employees?	A	Project Description, Air Quality.
38.	• Include a water analysis of existing wells in the area to include heavy metals and other contaminating elements.	A	Water Resources.
39.	• Please disclose any environmental infractions, illegal activities or fines levied on Western Waste Industries, Gold Field Mining Company, S.P. Environmental Systems, or subsidiaries.	C	Not a CEQA/NEPA issue. The Board of Supervisors has directed checks on the applicants and the owners.

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SUMMARY OF NOI RESPONSES

Comment No.	Commentor -- Date of Letter NOI Comment	Category	EIS/EIR Section/Remarks
	Citizens for the Chuckwalla Valley -- June 8, 1992 (continued)		
40.	• If the host fee were removed, would there still be a need for this dump?	A	Purpose and Need.
41.	• Please include publications from G. Fred Lee & Associates and Dr. Lee's credentials to enable the citizens of Imperial County to better judge this proposal.	A	The referenced documents are available for public review during normal business hours at the U.S. Bureau of Land Management, El Centro Resource Area Office located at 1661 South 4th Street, El Centro, Ca 92243.
	Edith Harmon -- June 11, 1992		
42.	Waste source of origin.	A	Background.
43.	Economic analysis of potential future demand for the landfill.	A	Socioeconomic.
44.	What will happen to the hazardous waste?	A	Project Description, Environmental Health & Public Safety.
45.	Describe how household hazardous waste will be identified, removed, stored.	A	Project Description, Environmental Health & Public Safety.
46.	Liner composition, manufacturer, history, installation, field testing, where results of testing are published.	A	Project Description.
47.	Chemical reactivity of liner and to what extent are chemical reactions responsible for liner failures.	A	Project Description.
48.	Estimated weight on bottom of landfill liner upon closure of landfill.	A	Project Description.
49.	Results of liner stress tests.	A	Project Description.
50.	Performance of structural materials during seismic event.	A	Geology/Soils/Mineral Resources.

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N/A = Not Applicable

SUMMARY OF NOI RESPONSES

Comment No.	Commentor -- Date of Letter NOI Comment	Category	EIS/EIR Section/Remarks
	Edith Harmon -- June 11, 1992 (continued)		
51.	EPA's concerns about solid waste management facilities published in U.S. EPA Federal Register Volume 53, No. 168, August 30, 1988. (Leachate generation, Leachate collection)	A	Project Description, Water Resources.
52.	Removal of leachate during post-closure period.	A	Water Resources, Mitigation, Monitoring and Reporting Program.
53.	Long-term leachate monitoring.	A	Project Description, Mitigation, Monitoring and Reporting Program.
54.	Area covered by each landfill cell? Landfill cell construction.	A	Project Description.
55.	How will cleanup be performed?	A	Water Resources, Mitigation, Monitoring and Reporting Program.
56.	Length of post-closure care.	A	Project Description, Mitigation, Monitoring and Reporting Program.
57.	Landfill cap maintenance, long-term maintenance costs.	A	Project Description.
58.	Materials composition of leachate collection system, manufacture, and performance history.	A	Project Description, Water Resources.
59.	What actions and/or monitoring is proposed to prevent clogging of leachate collection system?	A	Mitigation, Monitoring and Reporting Program.
60.	Thickness of material used for leachate collection system.	A	Project Description.
61.	Is the aquifer underlying the site alluvial fill or fractured rock?	A	Geology/Soils/Mineral Resources.
62.	Identify hydrogeologic relationship between portion of the aquifer underlying site and groundwater resources in Imperial County.	A	Water Resources.
63.	Potential consequences to groundwater from liner failure, costs for cleanup, and how clean up would be accomplished.	A	Water Resources, Socioeconomics.

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N/A = Not Applicable

SUMMARY OF NOI RESPONSES

Comment No.	Commentor -- Date of Letter NOI Comment	Category	EIS/EIR Section/Remarks
	Edith Harmon -- June 11, 1992 (continued)		
64.	Detail proposed groundwater monitoring system during operations and post closure.	A	Project Description/Water Resources.
65.	Will water be used for dust control, how much, how frequently, source, short-term/long-term impacts to water resources.	A	Water Resources/Air Quality.
66.	Will access roads to active portions of landfill be paved?	A	Project Description.
67.	Effect of heavy vehicles traveling to/from landfill face.	A	Air Quality.
68.	PM_{10} impacts.	A	Air Quality.
69.	Will water be used to wet down daily cover? How much? Source? Total amount of water required for wet-down of daily cover. Impacts to water resources.	A	Project Description, Water Resources.
70.	Water required for revegetation, nature of revegetation, criteria for success, monitoring.	A	Project Description.
71.	Table indicating all water requirements through termination of post-closure (daily/annual/100 years).	A	Water Resources.
72.	Will water requirements impact potential growth for Imperial County.	A	Water Resources.
73.	Water requirements impact on biological resources.	A	Biology.
74.	How will noise, dust, vibrations of landfill and mine affect mating of animals in the area?	A	Biology.
75.	How will closure cap be protected from burrowing animals?	A	Project Description, Mitigation, Monitoring and Reporting Program.
76.	Detail revegetation plans, types of species, monitoring.	A	Biology.
77.	Include table with weather data from sites within 30 miles which report to NOAA to determine range of seasonal/100 year rainfall events.	B	Air Quality.

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SUMMARY OF NOI RESPONSES

Comment No.	Commentor -- Date of Letter NOI Comment	Category	EIS/EIR Section/Remarks
	Edith Harmon -- June 11, 1992 (continued)		
78.	What measures will be taken to protect landfill from lightning strikes.	B	Environmental Health & Public Safety.
79.	Prepare demographic profile for County of Imperial, compare with the State of California.	A	Socioeconomics.
80.	Economic/social/environmental impacts from labor being devoted to landfill.	A	Socioeconomics.
81.	Access impacts on recreation.	A	Recreational Resources.
82.	Will Draft EIS/EIR be available in Spanish in accordance with 1983 La Paz Agreement.		The Bureau of Land Management and the County of Imperial have no plans to publish this EIS/EIR in any language other than English.
83.	Don't pre-draft EIS/EIR negotiations and acceptance of payments by project proponent constitute an agreement/expectation of prior approval of the project?	C	A Memorandum of Understanding (MOU) among the Bureau of Land Management, the County of Imperial, and Arid Operations, Inc., was executed in April 1992. This MOU provides procedures and guidance on coordination and cooperation among the parties of the MOU for the preparation of a joint EIS/EIR. This MOU does not constitute an agreement to assist the applicant in obtaining permits. A copy of the MOU is included in Appendix A-1 of the EIS/EIR.

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SUMMARY OF NOI RESPONSES

Comment No.	Commentor -- Date of Letter NOI Comment	Category	EIS/EIR Section/Remarks
	U.S. Environmental Protection Agency -- July 10, 1992		
84.	The EIS should address the potential direct, indirect, and cumulative impacts of the landfill. The EIS should discuss mitigation measures necessary to ensure protection of resources and compliance with applicable environmental laws and standards. The EIS should thoroughly describe and assess impacts to the land and resources that would be offered to BLM in exchange for the Project A or B sites.	A	Throughout EIS/EIR.
85.	BLM should consider including all necessary mitigation measures as well as closure and post-closure requirements as conditions of the land transfer agreement.	C	Comment noted.
86.	The landfill would be subject to the Solid Waste Disposal Facility Criteria (40 CFR) Part 258), which include location restrictions, operating criteria, design criteria, and financial assurance criteria, as well as provisions for groundwater monitoring, corrective action, closure, and post-closure care. The EIS should address how these criteria would be met.	A	Project Description.
87.	The EIS should describe the design and operation of the landfill and identify applicable permits and regulatory requirements.	A	Authorizing Actions, Project Description, and throughout EIS/EIR.
88.	The EIS should describe the process by which Mesquite Mine overburden and leached ore residue would be prepared for use as daily cover at the landfill.	A	Project Description and Water Resources.
89.	The EIS should discuss the source of the waste to be disposed at the proposed landfill. A thorough assessment of all transfer stations and the waste loading and unloading areas should be provided.	A	MSW Sources are described in Introduction, waste loading and unloading areas are described in Project Description, Future MRFs and transfer stations are not addressed in EIS/EIR (see Table 1-3).
90.	The EIS should describe the existing geology and hydrogeology of the area.	A	Geology/Soils/Mineral Resources and Water Resources.

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SUMMARY OF NOI RESPONSES

Comment No.	Commentor -- Date of Letter	Category	EIS/EIR Section/Remarks
	NOI Comment		
	U.S. Environmental Protection Agency -- July 10, 1992 (continued)		
91.	The EIS should discuss the potential impacts of the landfill on the quality and quantity of groundwater and surface water.	A	Water Resources.
92.	The EIS should discuss the on-site water reclamation plant.	A	Project Description, Water Resources.
93.	The EIS should discuss the cumulative impacts of stormwater runoff facilities.	A	These impacts are addressed as direct impacts in Water Resources.
94.	The EIS should discuss groundwater monitoring and contingency plans and corrective action for release of leachate.	A	Project Description, Water Resources.
95.	The EIS should describe existing air quality in the vicinity of the proposed site, National Ambient Air Quality Standards, Prevention of Significant Deterioration (PSD), Imperial County's status as non-attainment for PM_{10}, and New Source Review.	A	Air Quality.
96.	The EIS should identify any Class I PSD areas located within at least 100 kilometers of the proposed project site and discuss potential impacts to these areas, including visual impacts should be discussed.	A	Air Quality, Visual Resources.
97.	The EIS should discuss how the proposed project would meet the conformity requirements as defined in the Clean Air Act.	A	Air Quality.
98.	The EIS should identify impacts to rare, threatened, or endangered plant and wildlife species. Information on candidate species should also be provided.	A	Biological Resources.
99.	The EIS should discuss avoidance, minimization, and mitigation of loses or modifications of habitat and plant and animal species composition.	A	Biological Resources, Alternatives.

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SUMMARY OF NOI RESPONSES

Comment No.	Commentor -- Date of Letter NOI Comment	Category	EIS/EIR Section/Remarks
	U.S. Environmental Protection Agency -- July 10, 1992 (continued)		
100.	The EIS should discuss closure and post-closure care of the facility and identify the criteria that would be used to determine successful closure and reclamation of the site. The EIS should indicate whether the landfill would be reclaimed for recreation or other public purposes after closure pursuant to 43 CFR 2741.5(i).	A	Project Description.
101.	The EIS should discuss cumulative impacts of other projects in the vicinity including the Mesquite Gold Mine, the gravel borrow operations, the Chocolate Mountains Aerial Gunnery Range, and recreational activities in the Imperial Sand Dunes Recreation Area.	A	Cumulative Impacts.
102.	The EIS should discuss whether the plan of operation for the Mesquite Mine would need to be revised.	A	Introduction, Cumulative Impacts.

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MESQUITE REGIONAL LANDFILL EIS/EIR

APPENDIX A-3

ALTERNATIVE MESQUITE REGIONAL LANDFILL SITE SELECTION STUDY

JUNE 24, 1993

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APPENDIX A-3

ALTERNATIVE MESQUITE REGIONAL LANDFILL SITE SELECTION STUDY

This appendix contains the study that was used to identify potential locations for an alternative regional landfill site in Imperial County for comparative analysis with the proposed Mesquite Regional Landfill (Proposed Action). However, it should be noted that this study is not intended to be a comprehensive landfill site selection study identifying feasible landfill sites in Imperial County. Rather, this study identifies reasonable alternative landfill sites for the proposed Mesquite Regional Landfill. Because of its limited scope, this study would not prevent Imperial County or the Bureau of Land Management (BLM) from the future approval of another local/regional landfill project or expansion at any location in Imperial County. All such projects would be subject to site-specific environmental analysis pursuant to the California Environmental Quality Act (CEQA) and/or National Environmental Policy Act (NEPA).

The purpose of performing an analysis of potential off-site locations in Imperial County for the proposed Mesquite Regional Landfill is to comply with the provisions of Title 14 of the California Code of Regulations (CCR) § 15126(d) and 40 Code of Federal Regulations (CFR) § 1502.14. CEQA 14 CCR § 15126(d) provides that the environmental analysis shall:

> "Describe a range of reasonable alternatives to the project, or to the location of the project, which could feasibly attain the basic objectives of the project,. . .."

The off-site analysis was also conducted to address the policy described in that same regulation which states:

> "The discussion of alternatives shall focus on alternatives capable of eliminating any significant adverse environmental effects or reducing them to a level of insignificance . . ."

40 CFR § 1502.14(a)(b) and (c) require that an Environmental Impact Statement (EIS):

> (a) Rigorously explore and objectively evaluate all reasonable alternatives, . . .
>
> (b) Devote substantial treatment to each alternative considered in detail, including the proposed action, . . .
>
> (c) Include reasonable alternatives not within the jurisdiction of the lead agency.

Similarly, the National Environmental Policy Act Handbook (herein referred to as the BLM Handbook) requires that an EIS describe all reasonable alternatives to the proposed action to the same level of detail as the proposed action and that an EIS address how each alternative, with the exception of the No Action alternative, will generally accomplish the purpose and need for the action (BLM Handbook, Chapter V, Section (C)(3)(f)(3)).

The purpose of this alternative site selection study is to determine whether there are alternative sites within Imperial County such that the significant or potentially significant impacts associated with the proposed site could be avoided or reduced to below a level of significance. This alternative site selection study assumes that only the location of the landfill would be changed. The remaining elements of the Proposed Action, including but not limited to the size of the landfill, scope of operations, and the landfill's life span, are assumed to be similar to those identified for the Proposed Action.

As described in Section 2.1 of this EIS/EIR, the Proposed Action includes a regional landfill to be located adjacent to the existing Mesquite Gold Mine and Ore Processing Facility. The proposed landfill would accommodate up to 600 million tons of municipal solid waste (MSW) residue and would have a life span of approximately 100 years. The 4,322-acre project site would encompass all or parts of Sections 7, 8, 15, 16, 17, 18, 19, 20, and 21, and Tract 38 in Township 13S Range 19E, San Bernardino Meridian, on the United States Geological Survey (USGS) Acolita and Quartz Peak 15-minute series quadrangles.

This alternative site selection study was prepared using existing data sources and is presented in three parts. Section 1.0 contains the application of key site selection criteria to all areas of Imperial County. These criteria were established based on required regulatory landfill design factors, obvious land use conflicts, and environmental resources that could be affected by the siting of a landfill. Areas within Imperial County that were eliminated as potential alternative sites, based upon the application of the site selection criteria, are presented on Figures A.3-1 to A.3-11.

Section 2.0 contains an evaluation of remaining regions within Imperial County that were not eliminated through the application of the criteria identified in Section 1.0. Additional site evaluation considerations are identified and applied to these remaining regions to determine whether a landfill in the alternative areas would avoid a significant impact identified at the proposed site, or reduce the impact to below a level of significance. Included as part of this determination is an evaluation of suitability for development and of whether an alternative site would meet the project objectives identified in Chapter 1.0 of the EIS/EIR. Figure A.3-12 depicts the remaining regions for landfill development, and is a composite of all areas that were not eliminated from consideration based upon the application of the site selection criteria.

The conclusions of the site selection process are presented in Section 3.0.

1.0 APPLICATION OF SITE SELECTION CRITERIA

In searching for potential alternative sites for the Mesquite Regional Landfill, several key site selection criteria were established. These criteria were based on important legal or regulatory requirements for landfill development, land use conflicts, and BLM's land use and resource protection policies. The site selection criteria are listed below:

- The site's substrate must offer natural hydrogeologic conditions that result in at least 5 feet of separation from underlying ground water as required by 23 CCR Chapter 15.

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- The site must not be located within 200 feet of a potentially active (Holocene) fault as required under *Subtitle D of the Resource Conservation and Recovery Act* (RCRA).
- The site must not be located in an area where BLM multiple-use class guidelines preclude a land exchange.
- The site must not be located on Department of Defense (DOD) lands or other federal lands withdrawn for DOD use. Such lands are referred to as DOD lands in this EIS/EIR.
- The site must not be located on a Native American Indian Reservation.
- The site must not be located on land containing topography that is incompatible with landfill development (e.g., mountainous terrain or sand dunes).
- Relative to the proposed Mesquite Regional Landfill Site, the alternative site must not be located within a region where landfill development would result in additional significant impacts to sensitive biological resources known to occur in the area.
- The site must not be located within an area identified in the Draft Update of the Imperial County General Plan as being "very sensitive" for prehistoric cultural resources.
- The site must not be located within three-miles of an incorporated city or unincorporated community with a population of 1,000 or more persons.

Application of these criteria is discussed in greater detail in the following sections.

1.1 Separation From Ground Water

Imperial County is characterized by two separate geologic regions, the Colorado Desert Province, and the Mojave Desert Province. The boundary of these areas is a broad plain that stretches northwest to southeast through the central portion of Imperial County known as the Salton Trough. This large trough formed as a result of crustal spreading between the North American and Pacific Tectonic Plates along the San Andreas Fault System. The Salton Trough contains the Salton Sea at its lowest point, which has an elevation of over 200 feet below sea level. Title 23 CCR Chapter 15 prohibits landfills in areas with less than a five (5) foot separation between ground water and the ground surface.

Some excavation would be required to construct the base liner and monitoring systems for a landfill of the scope and capacity included in the Proposed Action. In consideration of the necessary excavation, this study eliminates areas where ground water occurs within approximately 10 to 15 feet of the ground surface. According to the United States Geological Service maps ground water in the area around the Salton Sea is very shallow. Figure A.3-1 shows areas around the Salton Sea where the ground water occurs within 10 to 15 feet of the surface of the ground. These areas were eliminated from further consideration as an alternative site location due to shallow ground water.

1.2 Holocene Faulting

RCRA specifies landfill siting and design requirements. These requirements prohibit construction of a landfill within 200 feet of a Holocene fault. To be conservative, the seismic criteria developed for this siting study is based on maximum potential structural displacement due to peak horizontal accelerations which could be expected to occur from Holocene faults.

Figure A.3-2 shows the location of Holocene faults in Imperial County as identified in a recent study by the California Division of Mines and Geology (State of California, 1992). This study was performed statewide for Caltrans to provide design criteria for highway construction. As part of the study, the maximum horizontal acceleration contour lines were developed extending away from the identified Holocene faults based on the maximum probable earthquake which could be estimated to occur at each location. Horizontal acceleration is a way to predict the potential displacement that a structure would experience at a particular location in the event of an earthquake. The "Possible Holocene Faulting" zones on Figure A.3-2 correspond to zones identified by the California Division of Mines and Geology (CDMG) study as having the potential for horizontal accelerations of 0.5 times the acceleration of gravity (g) and above. The possible Holocene faulting areas were eliminated as potential locations for a regional landfill because these areas have a greater potential for surface disruptions during a large earthquake than does the site of the proposed Mesquite Regional Landfill. It should be noted that the CDMG study identified that the Mesquite Regional Landfill site is located in an area with a maximum potential horizontal acceleration of less than 0.2 gs.

1.3 BLM Protected Areas

The California Desert Conservation Area Plan (CDCA) establishes guidelines for the management of public lands of the California Desert by the Bureau of Land Management (BLM, 1980). The goal of the plan is to provide for the use of public lands and resources of the California Desert Conservation Area. This goal is achieved through the direction given for management actions and resolutions of conflicts. Direction is stated first on a geographic basis in the guidelines for each of the four multiple-use classes. Within those guidelines, further refinement of direction is expressed in the goals for each Plan element. Direction is also expressed in certain site-specific Plan decisions such as Areas of Critical Environmental Concern (ACECs).

All public lands in the CDCA under BLM management, except for a few small and scattered parcels, have been designated geographically into four multiple-use classes. Each class describes a different type or degree of use permitted within that geographical area. The multiple-use classes include Class C (Controlled Use), Class L (Limited Use), Class M (Moderate Use), and Class I (Intensive Use). The CDCA Plan was adopted in 1980 and has been amended on an annual basis from 1981 to 1990. Figure A.3-3 presents the CDCA Plan map and includes 1981 through 1990 plan amendments.

Multiple-Use Class C and L lands are not available for disposal under the CDCA. These lands include the "Wilderness Study Areas" identified in the Wilderness Element (Figure A.3-4).

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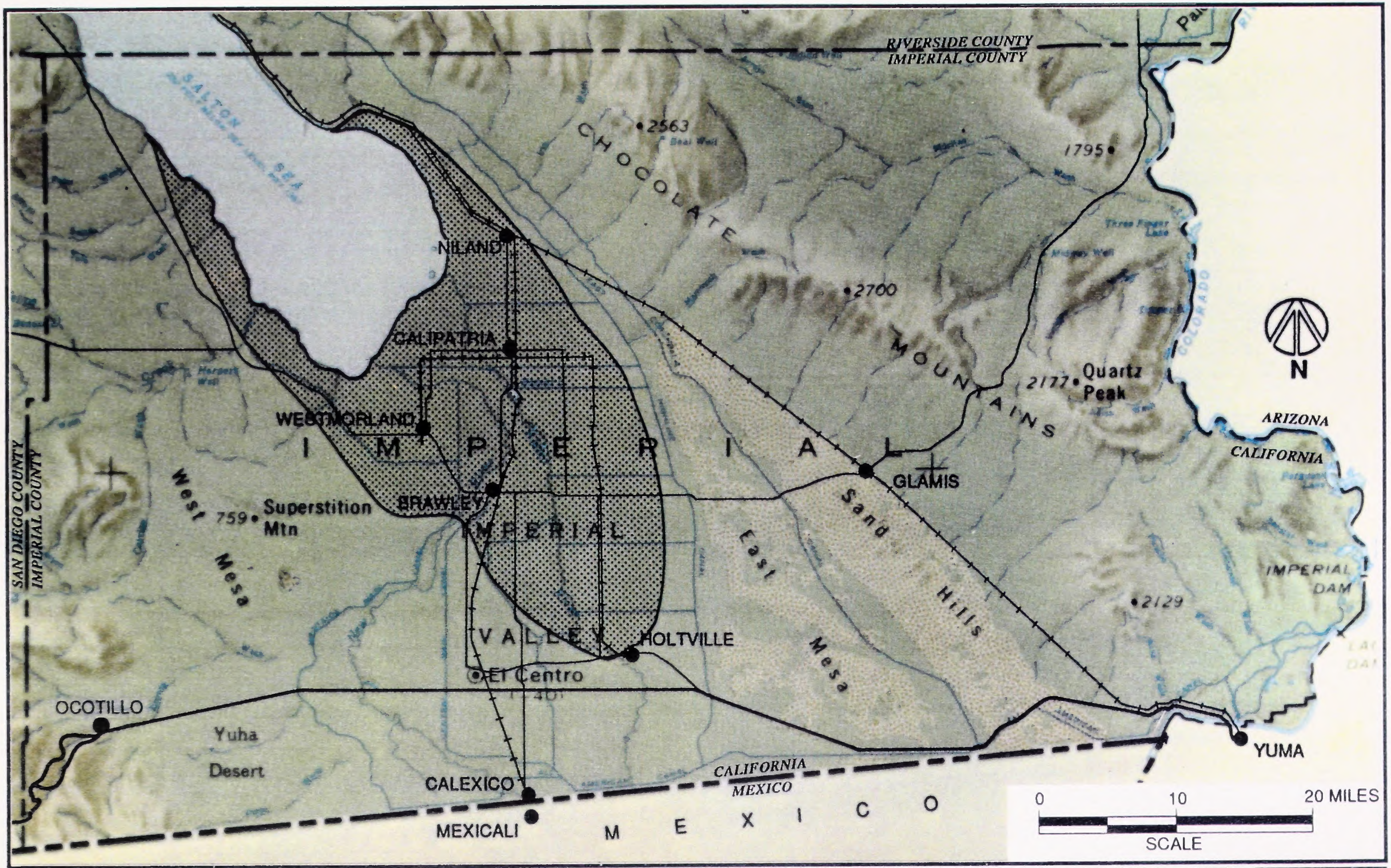

SOURCE: USGS 1:1,00,000 scale map of The State of California, dated 1971.

Proposed Mesquite Regional Landfill

DRAFT

Groundwater Criteria

FIGURE

A.3-1

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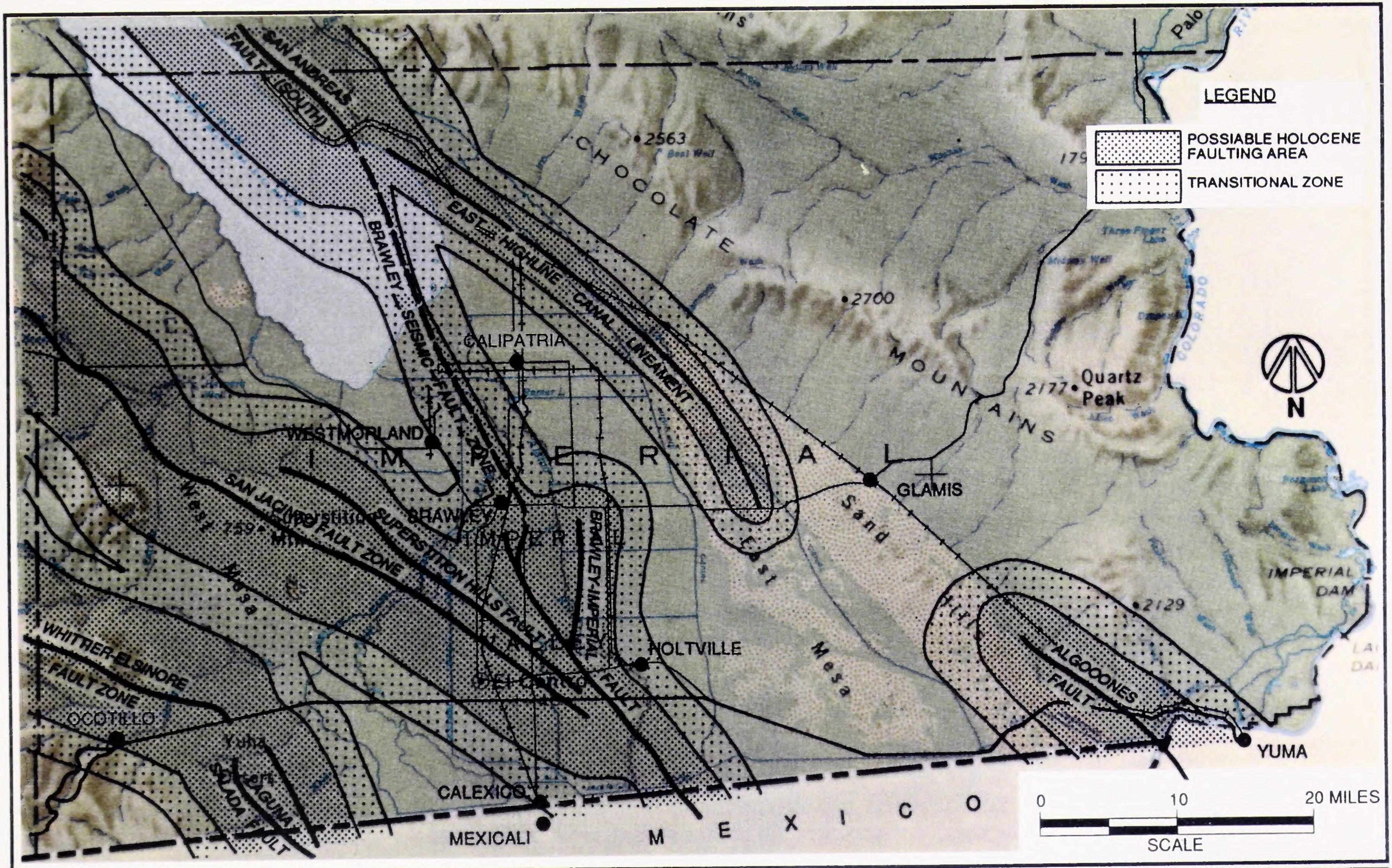

SOURCE: Caltrans Division of Mines and Geology, Peak Acceleration Study From Maximum Credible Earthquakes in California, 1992.

Proposed Mesquite Regional Landfill

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Seismicity

FIGURE

A.3-2

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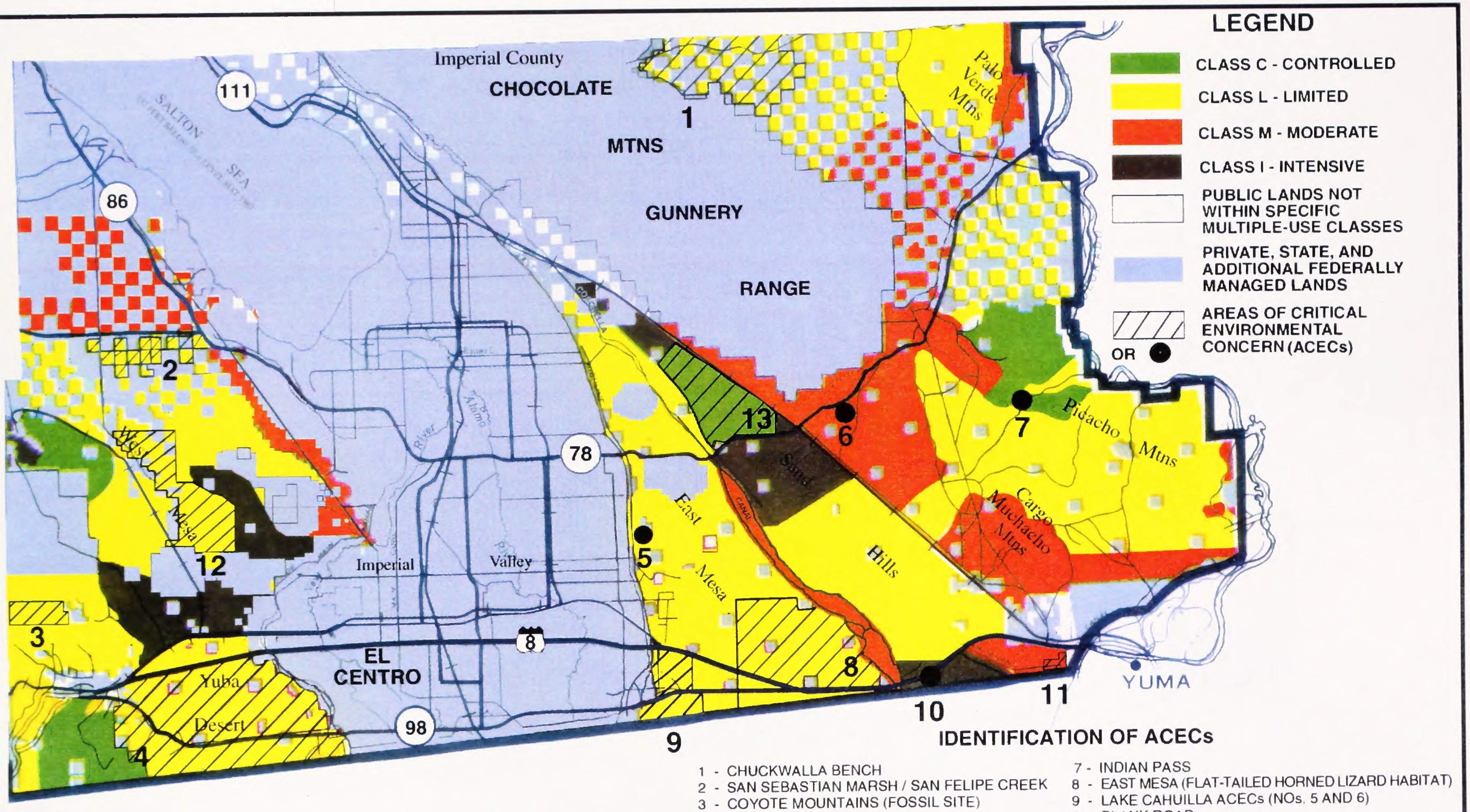

LEGEND

- 🟩 CLASS C - CONTROLLED
- 🟨 CLASS L - LIMITED
- 🟥 CLASS M - MODERATE
- ⬛ CLASS I - INTENSIVE
- ☐ PUBLIC LANDS NOT WITHIN SPECIFIC MULTIPLE-USE CLASSES
- 🟦 PRIVATE, STATE, AND ADDITIONAL FEDERALLY MANAGED LANDS
- ▨ OR ● AREAS OF CRITICAL ENVIRONMENTAL CONCERN (ACECs)

IDENTIFICATION OF ACECs

1 - CHUCKWALLA BENCH
2 - SAN SEBASTIAN MARSH / SAN FELIPE CREEK
3 - COYOTE MOUNTAINS (FOSSIL SITE)
4 - YUHA BASIN
5 - LAKE CAHUILLA ACECs (NOs. 2 AND 3)
6 - SINGER GEOGLYPH
7 - INDIAN PASS
8 - EAST MESA (FLAT-TAILED HORNED LIZARD HABITAT)
9 - LAKE CAHUILLA ACECs (NOs. 5 AND 6)
10 - PLANK ROAD
11 - PILOT KNOB
12 - WEST MESA
13 - ALGODONES DUNES ACEC

NOTE: The purpose of this map is to aid in the identification of an Alternative Site for comparison to the proposed Mesquite Regional Landfill Site. Detailed information regarding BLM Land Use Designations in Imperial County should be confirmed with the BLM.

SOURCE: BLM CDCA Plan, 1980. Includes 1981 to 1990 Plan Amendments.

Prepared by Environmental Solutions, Inc., 1993.

Proposed Mesquite Regional Landfill

BLM Land Use Designations

FIGURE A.3-3

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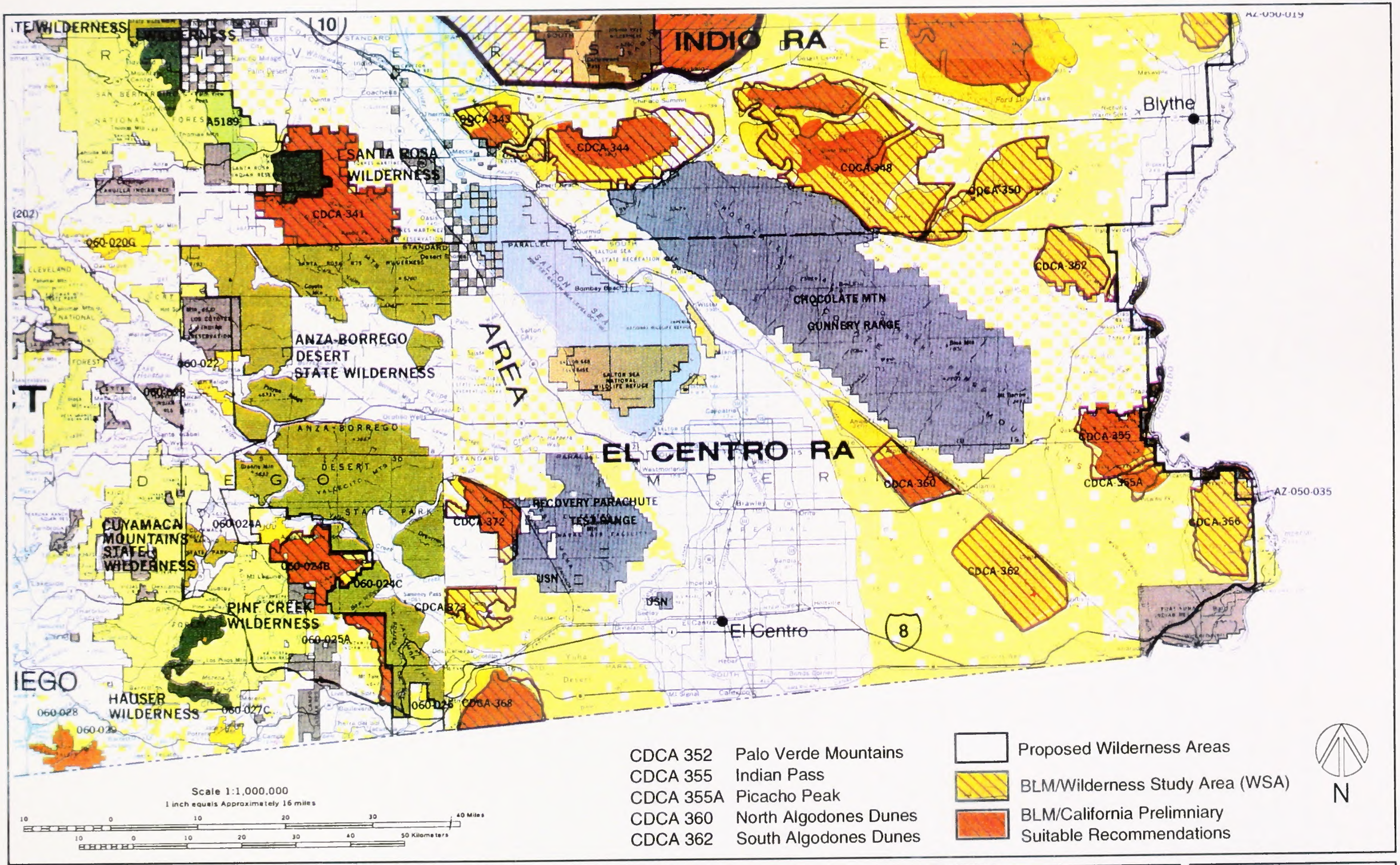

SOURCE: Bureau of Land Management, Wilderness Status Map, 1991.

Proposed Mesquite Regional Landfill

Location of Wilderness Areas / Wilderness Study Areas in Imperial County

FIGURE

A.3-4

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Multiple-Use Class M is based upon a controlled balance between higher intensity use and protection of public lands and allows "Moderate" use of the area. Multiple-Use Class I is an "Intensive Use" class. Its purpose is to provide for concentrated use of lands and resources to meet human needs. The management guidelines (1987 amendment) indicate that new waste disposal sites are not allowed on BLM-managed public lands. However, the guidelines indicate that locations suitable for waste disposal, when found on Class M lands, may be transferred to other ownership through sale or transfer. If suitable disposal site locations are found on Class C, Class L or Class I lands, BLM requires that the land be reclassified to Class M and subsequently transferred to other ownership. The reclassification would require a CDCA Plan amendment and must demonstrate that an "overriding social benefit" would occur with the reclassification.

BLM lands that are designated Multiple-Use Class C, Class L, and Class I were eliminated from further consideration in the selection of an alternative site for the proposed Mesquite Regional Landfill. The elimination of Class C and Class L lands would also exclude lands within "Wilderness Study Areas." Thus, for lands under BLM management, the alternative site for the proposed Mesquite Regional Landfill must be located within lands designated as Class M.

In support of the goal of the CDCA Plan and the Federal Land Policy and Management Act (FLPMA), special areas designated as Areas of Critical Environmental Concern (ACEC) have been selected which possess rare, unique, or unusual qualities of scientific, educational, cultural or recreational significance. The location of the 15 ACECs within Imperial County are also denoted on Figure A.3-3. Areas designated as ACECs were eliminated from consideration as an alternative landfill site.

1.4 DOD LANDS

Figure A.3-5 shows the location of DOD Lands as identified on the BLM California Desert District, Desert Access Guides 20, 21, and 22. These areas are considered inappropriate for a proposed regional landfill because there is no indication that the DOD plans to excess any of these lands (i.e., these lands would not be available for landfill development). In addition, areas that have been used for military purposes could pose increased public safety hazards. For example, there is the potential for undetonated ordinance to be present in areas currently or previously used as live aerial bombing ranges. Likewise, the potential exists for hazardous materials, related to military activities, to be present in these areas. Therefore, DOD lands were eliminated from consideration as an alternative landfill site.

1.5 Native American Indian Reservations

Figure A.3-6 depicts Native American Indian Reservations within Imperial County as identified on the BLM California Desert District, Desert Access Guides 20, 21, and 22. These areas are considered inappropriate for a proposed regional landfill because the applicant could not reasonably obtain the use of these lands to construct and operate a regional landfill. Therefore, these lands were eliminated from consideration as an alternative landfill site.

1.6 Incompatible Topography

Figure A.3-7 shows land that was eliminated from consideration as an alternative location for the regional landfill based on incompatible topography. This primarily consists of rugged mountainous areas and the sand dunes.

1.7 Threatened or Endangered Species

The alternatives analysis requirement under CEQA and NEPA is designed to, among other things, determine if potential significant impacts associated with a proposed action can be reduced or eliminated to below a level of significance. A potentially significant site-related impact associated with the proposed Mesquite Regional Landfill Site is the biological resource impact associated with the presence of Category 3 desert tortoise habitat at the site. The desert tortoise has been listed as a "Threatened" Species under the Endangered Species Act. Based upon the BLM's Interim Map of Tortoise Habitat Categories (BLM, 1989), certain areas of Imperial County contain Category 1, Category 2, and potential Category 3 habitat. These habitat areas are shown on Figure A.3-8. This study eliminates all Category 1 and Category 2 Desert Tortoise habitat because siting a landfill in these areas would impact higher quality habitat than is present at the proposed site.

The flat tailed horned lizard (*Phrynosoma mcallii*) is listed as "Threatened" by the California Department of Fish and Game (CDFG) and is a Category 1 candidate for the federal "Endangered" species list (Imperial County, 1993). The BLM has been conducting inventory and monitoring studies on an annual basis since 1970, to assess range, distribution, and relative population trends for the flat-tailed horned lizard in Imperial County (BLM, nd). Population monitoring has primarily occurred in three ACECs. Flat-tailed horned lizard habitat is shown on Figure A.3-9 and is derived from the BLM's flat-tailed horned lizard relative abundance map. Locating a site in these areas would result in an additional adverse biological impact that would not occur at the proposed Mesquite Landfill site. BLM has indicated that compensation may be required for disturbance to habitat of this species. Category 1 and Category 2 flat-tailed horned lizard habitat have been eliminated from further consideration in this study due to the medium to high relative abundance of flat-tailed horned lizard populations in these areas. Category 3 habitat has not been eliminated because of the relatively low numbers of individual specimens that would likely be affected.

1.8 Cultural Resources

Approximately 7,000 prehistoric and 200 historic sites have been recorded in Imperial County (Imperial County, 1993). Avoidance of areas that are very likely to contain sensitive cultural resources is a necessary consideration in identifying potential alternative sites for the Proposed Mesquite Regional Landfill. The County of Imperial Draft General Plan Update (January 25, 1993) includes a map delineating general areas of Imperial County that are very sensitive, moderately sensitive and not expected to contain prehistoric resources. Areas shown on this map as very sensitive are shown on Figure A.3-10 and were eliminated from consideration as an alternative site for the proposed Mesquite Regional Landfill. These areas were eliminated

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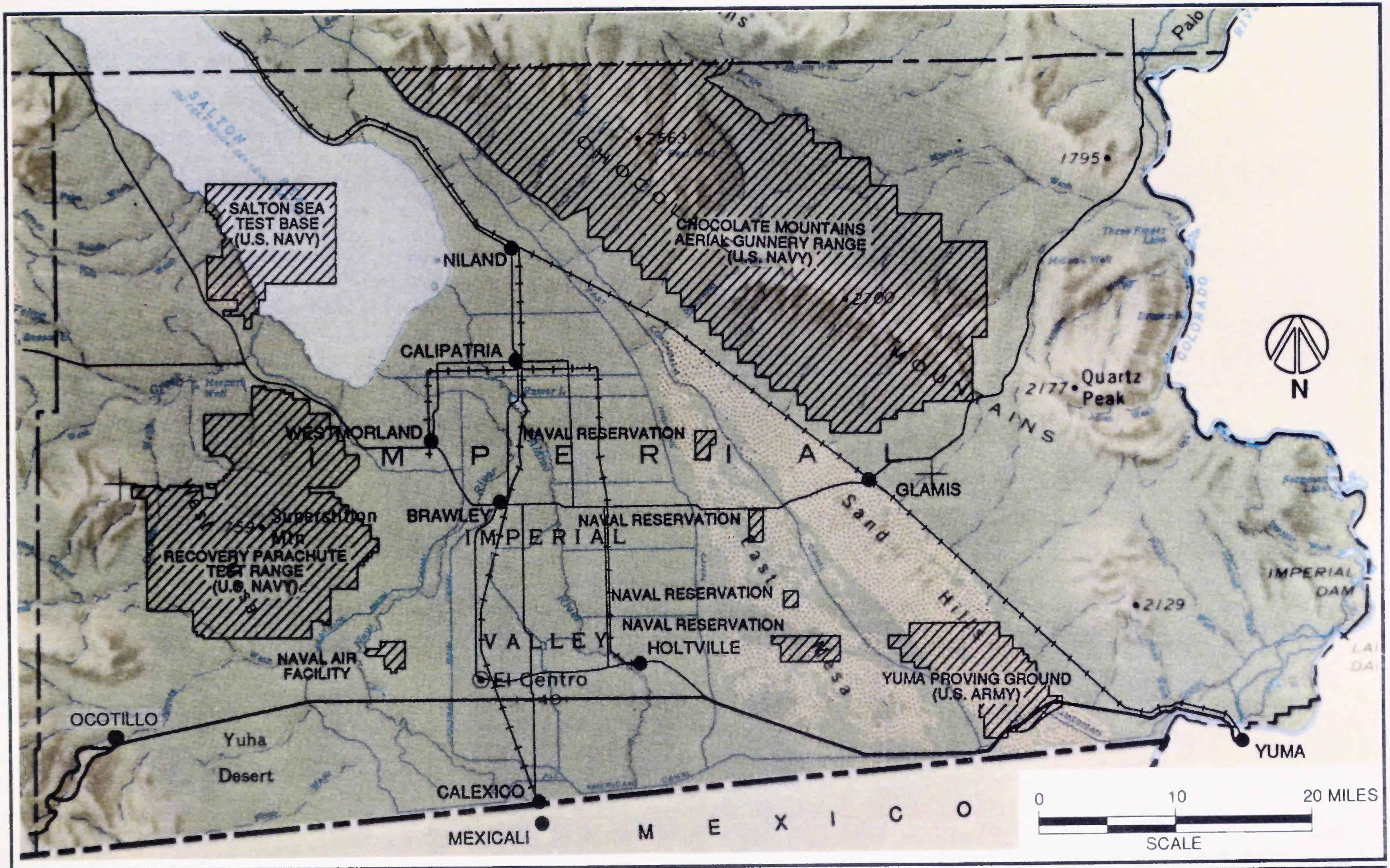

SOURCE: BLM, California Desert Conservation Area Plan 1980; Included Amendments 1981-1987.

Proposed Mesquite Regional Landfill

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Military Bases/Operational Areas

FIGURE

A.3-5

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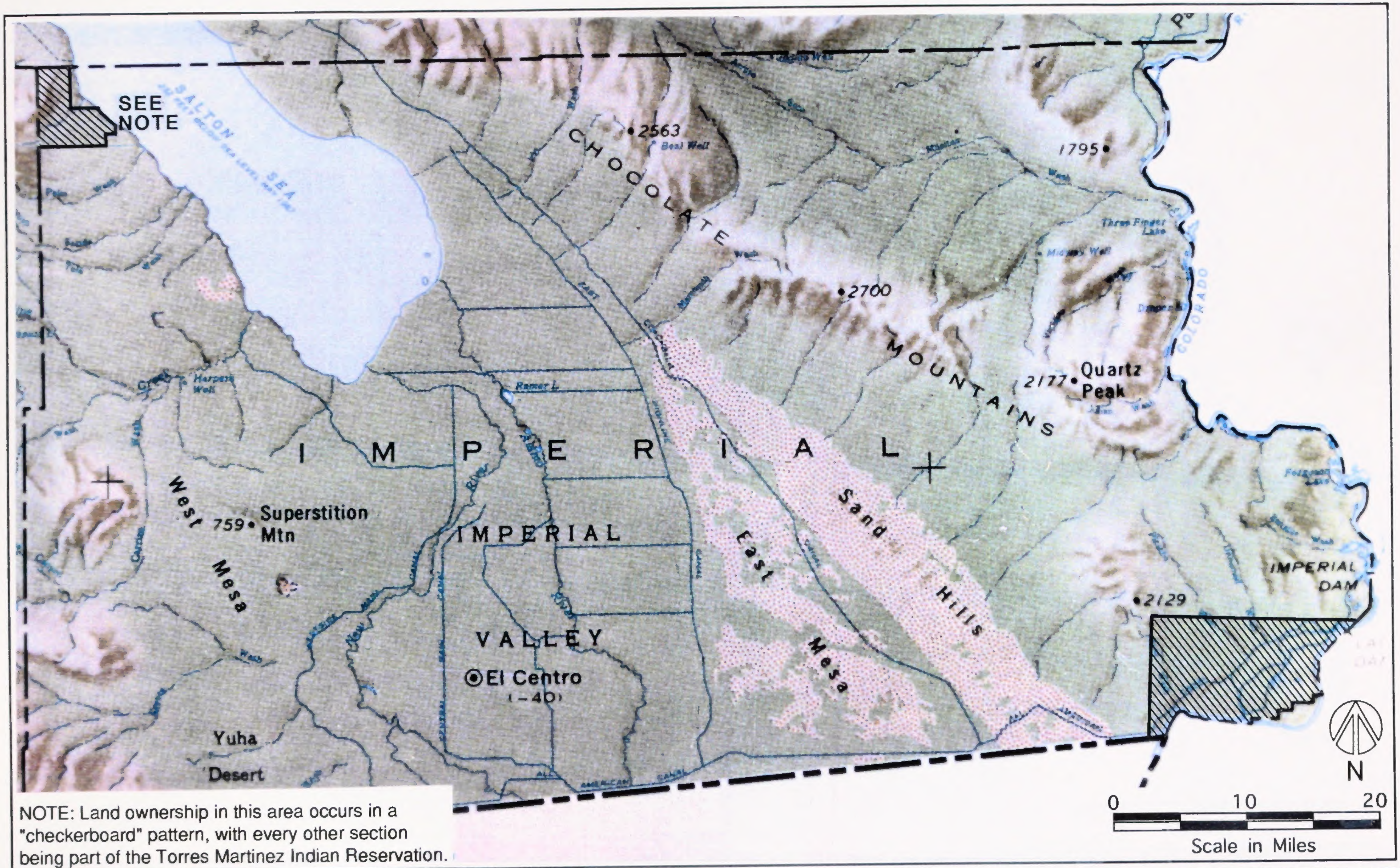

NOTE: Land ownership in this area occurs in a "checkerboard" pattern, with every other section being part of the Torres Martinez Indian Reservation.

SOURCE: Bureau of Land Management, Desert Access Guides, 20,21, and 22, 1992.

Basemap: USGS 1:100,000 Scale Map of California, 1971.

Proposed Mesquite Regional Landfill

Native American Indian Reservations

FIGURE A.3-6

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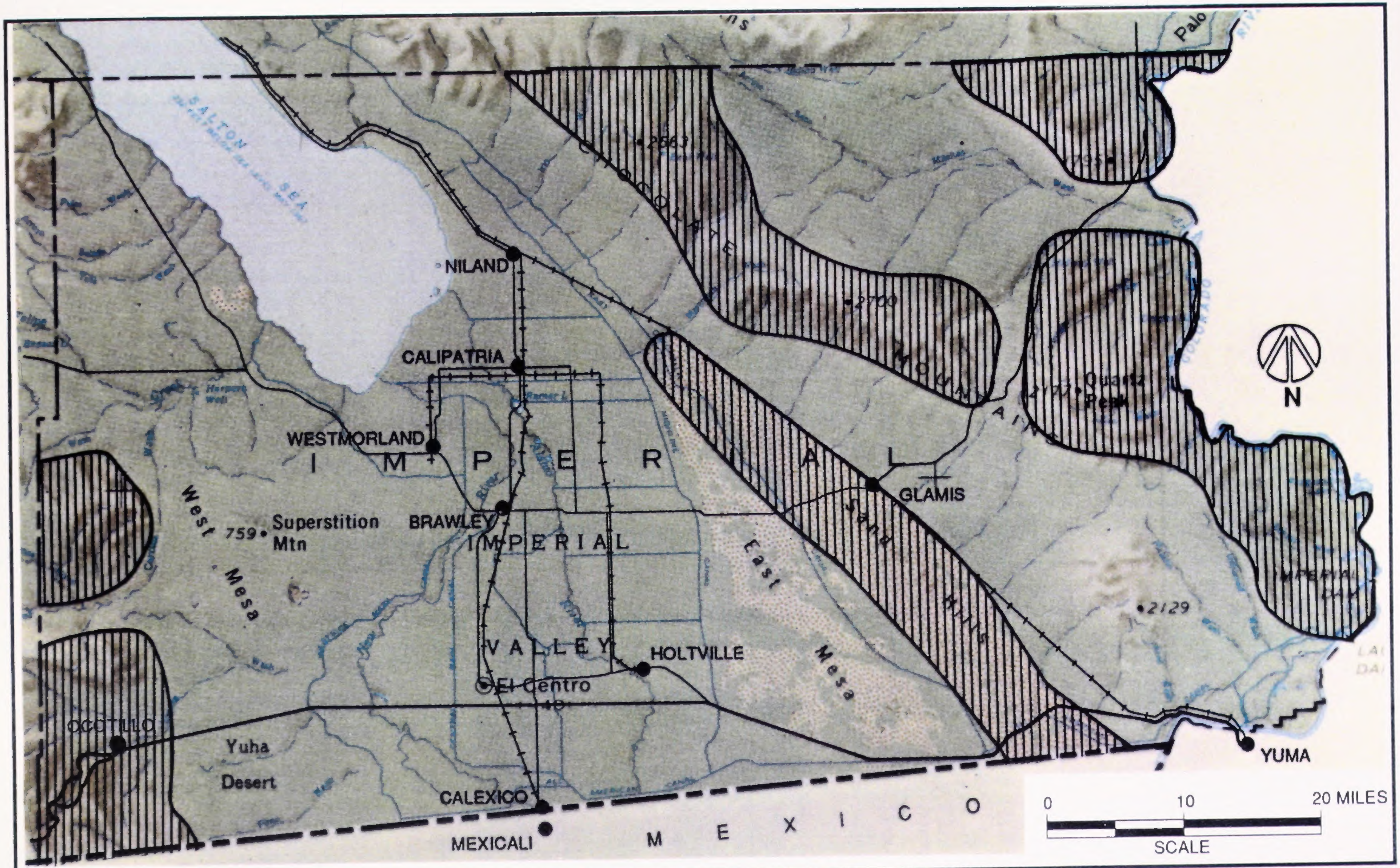

SOURCE: USGS 1:1,00,000 scale map of The State of California, dated 1971.

Proposed Mesquite Regional Landfill

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Topographical Constraints

FIGURE

A.3-7

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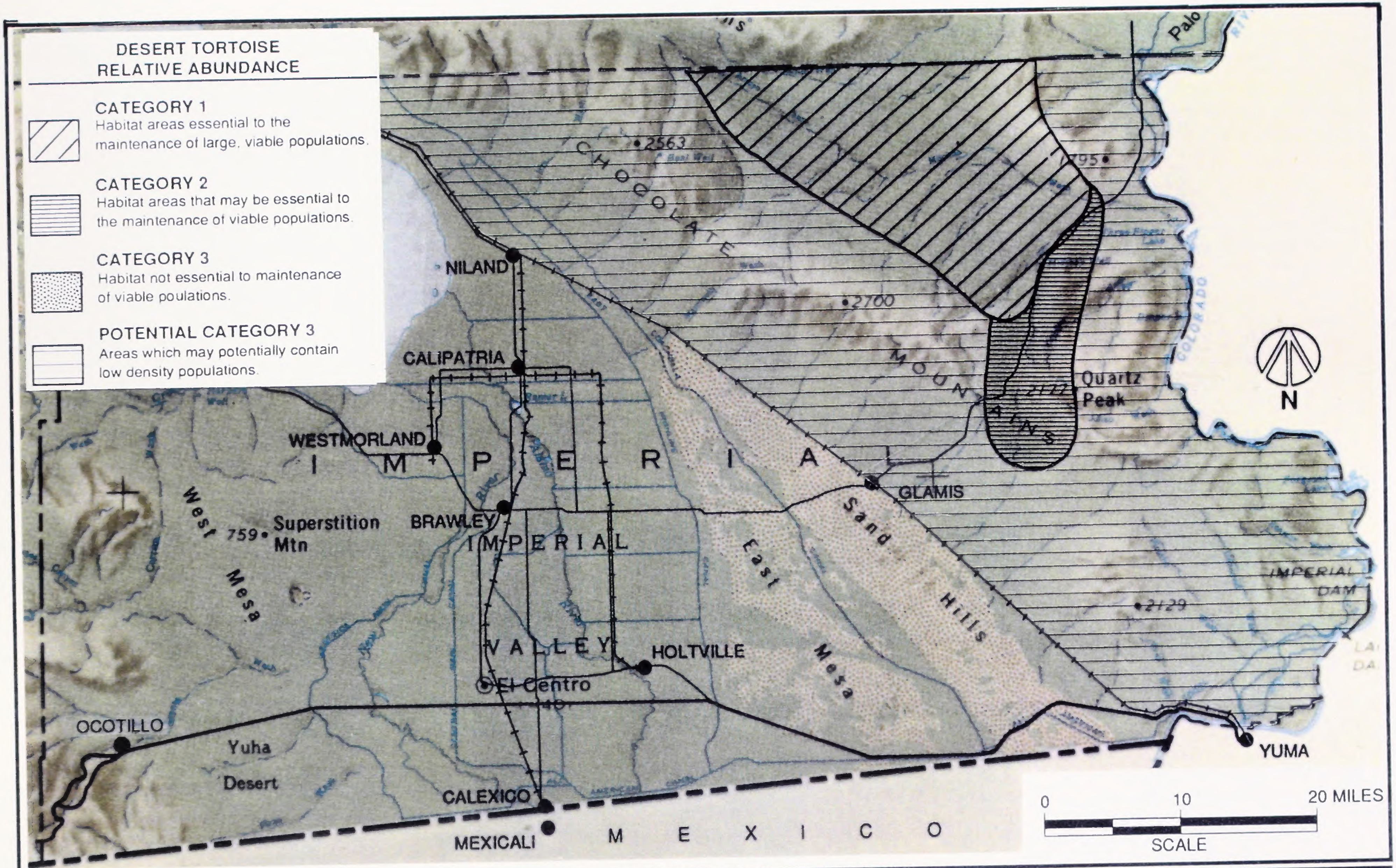

SOURCE: Based on Preliminary Evaluations, BLM, El Centro Resource Area.

Proposed Mesquite Regional Landfill

Desert Tortoise Habitat

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FIGURE

A.3-8

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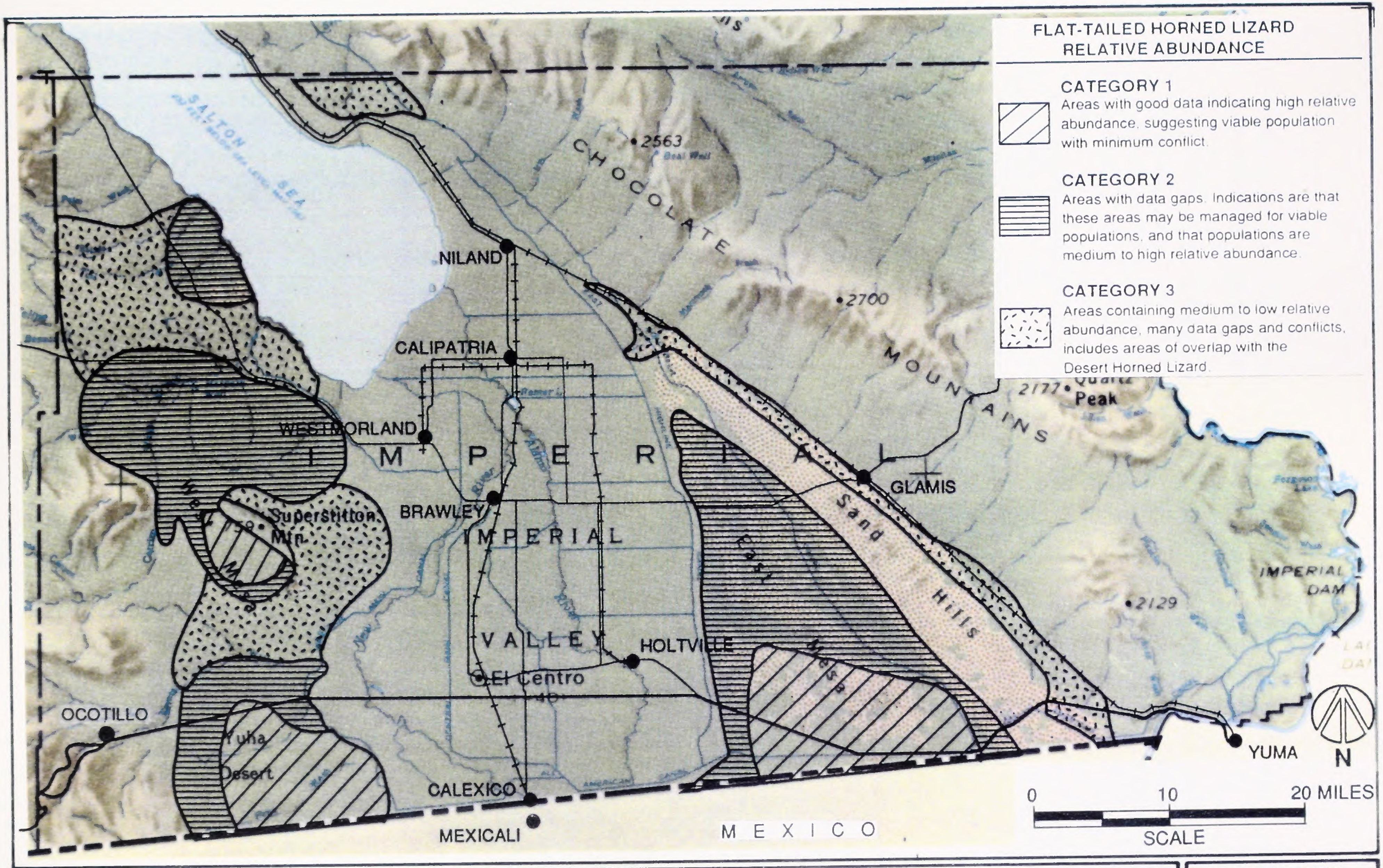
FLAT-TAILED HORNED LIZARD RELATIVE ABUNDANCE
▨ CATEGORY 1
Areas with good data indicating high relative abundance, suggesting viable population with minimum conflict.
▤ CATEGORY 2
Areas with data gaps. Indications are that these areas may be managed for viable populations, and that populations are medium to high relative abundance.
░ CATEGORY 3
Areas containing medium to low relative abundance, many data gaps and conflicts, includes areas of overlap with the Desert Horned Lizard.
SALTON SEA
CHOCOLATE MOUNTAINS
•2563
•2700
2177• Quartz Peak
•2129
IMPERIAL DAM
NILAND
CALIPATRIA
WESTMORLAND
BRAWLEY
IMPERIAL
IMPERIAL VALLEY
HOLTVILLE
El Centro
CALEXICO
MEXICALI
OCOTILLO
GLAMIS
YUMA
Sand Hills
East Mesa
West Mesa
Superstition Mtn.
Yuha Desert
MEXICO
N
0 10 20 MILES
SCALE

SOURCE: Based on Preliminary Evaluations, BLM, El Centro Resource Area.

Proposed Mesquite Regional Landfill

Flat-Tailed Horned Lizard Habitat

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FIGURE
A.3-9

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because it is unknown what type of cultural resources occur in these areas and whether the impacts could be mitigated to below a level of significance.

It should be noted that the proposed Mesquite Regional Landfill Site is located in an area identified in the Draft Updated General Plan as "very sensitive" for cultural resources. However, extensive cultural resource investigations have been conducted for the Mesquite Mine. In addition, Treatment Plans, approved by BLM, the State Historic Preservation Officer, and the President's Advisory Council on Historic Preservation, have been implemented to mitigate cultural resource impacts associated with the Mesquite Mine. Therefore, because a sufficient amount of information is known about the Mesquite Mine and the proposed site, relative to on-site cultural resources and appropriate mitigation, the Mesquite Mine area, north of SR 78, is not shown as "very sensitive" on Figure A.3-10.

1.9 Population

A regional landfill would not be desirable in a populated area due to adverse operational characteristics (e.g., traffic, noise, dust, odors) associated with the 24-hour landfilling operations included in the Proposed Action. The County of Imperial, as part of its General Plan Update, has identified a minimum buffer area between new solid waste facilities and surrounding land uses. According to the Draft General Plan Update, the minimum buffer required for any area proposed for the permanent placement of solid waste shall be 1,320 feet (one-quarter mile) from any lands not owned or controlled by the land fill owner or operator.

There are no permanent residents within three miles of the proposed site. This analysis establishes a 3-mile buffer from population centers in Imperial County with 1,000 or more persons to account for private/public land uses which typically surround populated areas. Population data was obtained from the Imperial County Division of Community Economic Development (Imperial County, 1992). Incorporated cities and unincorporated communities within Imperial County with 1,000 or more persons are listed on Table A.3-1 and shown on Figure A.3-11. Thus, areas within 3-miles of communities with populations that exceed 1,000 persons were given no further consideration in this study. Consideration of effects on areas with smaller populations would be conducted on a site-specific basis as part of project design.

1.10 Remaining Areas Of Imperial County

By applying the site selection criteria identified in this study, substantial portions of Imperial County were eliminated from further consideration as alternative sites for the proposed Mesquite Regional Landfill. That is to say, from an environmental perspective, those areas that have been eliminated would result in reasonably anticipated increased environmental effects as compared to the proposed site. Figure A.3-12 identifies the remaining areas. Six distinct regions remain as possible alternative locations for the proposed Mesquite Regional Landfill. Three of these regions are really subregions because of their relatively close proximity and small size. The regions are numbered 1A, 1B, 1C, 2, 3, and 4 for ease of reference.

2.0 EVALUATION OF REMAINING REGIONS WITHIN IMPERIAL COUNTY

To evaluate the remaining potential regions shown in Figure A.3-12, several additional important siting considerations were identified. While not enough to qualify as site selection criteria, these considerations may indicate potential significant impacts to the remaining areas which are evaluated. The additional considerations also involve project feasibility issues which would influence site selection.

These considerations also allow an evaluation of whether significant impacts associated with the proposed action would be avoided or reduced to below a level of significance at an alternative site. Therefore, these considerations are important factors in the final site selection determination. This study sought to avoid any site that would likely result in additional and/or greater impacts than the proposed site.

The following additional site considerations are shown below:

- Productive Agricultural Lands: The County has established the protection of productive agricultural land as an important land use planning goal. In recognition of the importance of agricultural production in Imperial County, an Agricultural Element has been added to the County of Imperial Draft General Plan Update (Imperial County, 1993). As a result, protection of agricultural land is a site consideration, though not an elimination criteria, in selection of an alternative site for the proposed Mesquite Regional Landfill. In addition, information from the California Department of Conservation Farmland Mapping and Monitoring Program (State of California, 1990) was also used in this site selection study.
- Transportation Access: The proposed regional landfill would require rail-haul for the delivery of MSW residue. Proximity to existing rail facilities is an important consideration because it determines the length of the rail spur that would be required. Availability of access roads for employees, deliveries, and services is also an important consideration. While these features could be constructed for any selected site area, a new rail access spur or off-site project access road of greater than 10 to 15 miles is considered to be significant, for purposes of this analysis, based on the new disturbance, the associated environmental impacts, and the considerable costs that would result from such construction.
- Availability of clay and cover material: It is estimated that the proposed regional landfill will require up to 200 million cubic yards of material for daily and intermediate cover. An additional 7- to 8-million cubic yards of clay would be required for construction of the landfill liner. Without the overburden and ore residue piles from the Mesquite Mine, cover materials would have to be excavated from a borrow area within the site boundaries. Initially, the excavations could occur within the landfill footprint. However, excavations within the landfill footprint could not extend to closer than 15 feet above the water table. This would allow room for additional excavations to construct the base liner and monitoring systems and still comply with state regulations requiring at least 5 feet separation between the bottom of the landfill and the highest natural level of ground water. Since the remaining regions have a depth to ground water of no more than

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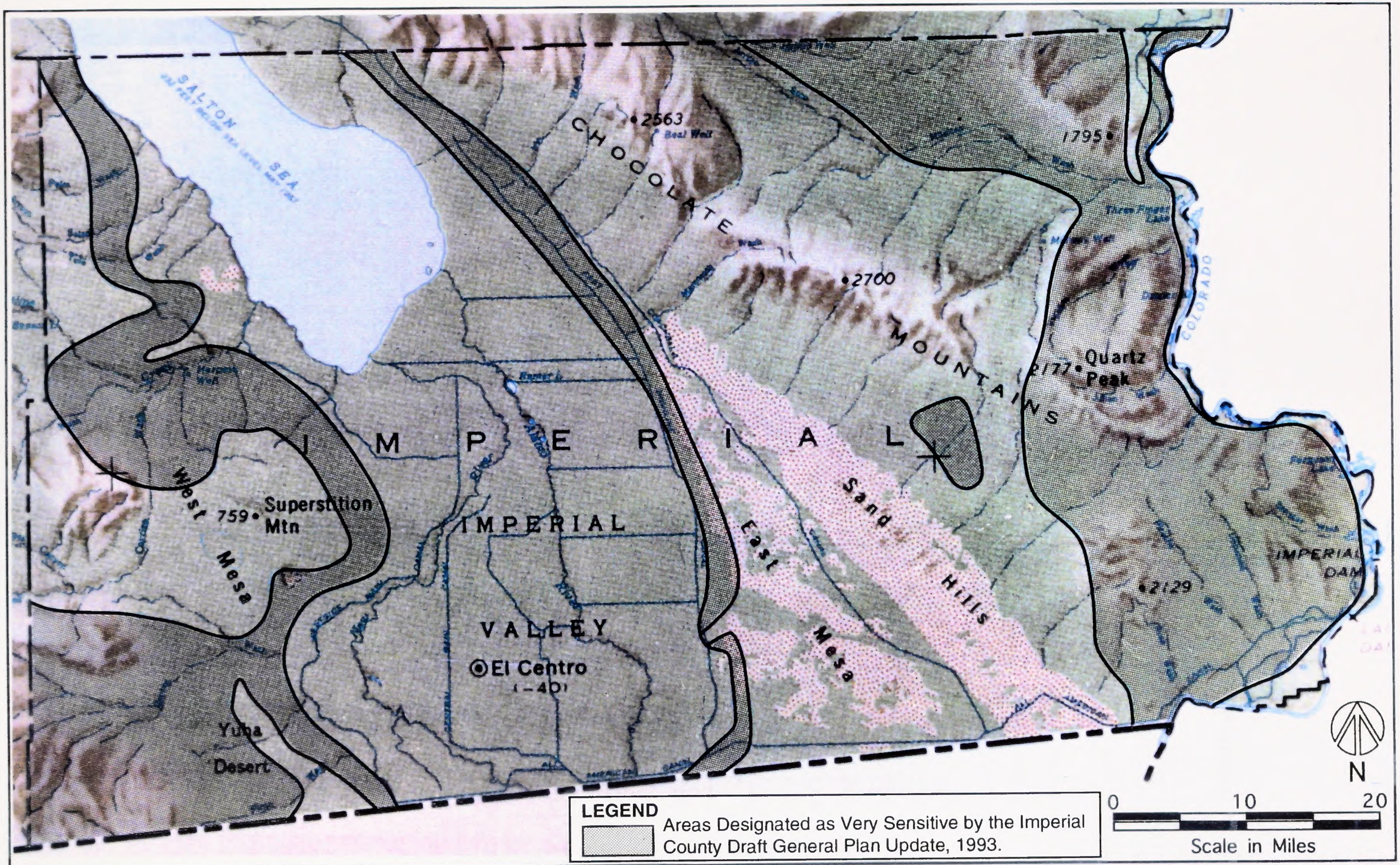

SOURCE: Imperial County Draft General Plan Update, 1993.

Basemap: USGS 1:100,000 Scale Map of California, 1971.

Proposed Mesquite Regional Landfill

Cultural Resources Sensitivity Map

FIGURE A.3-10

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TABLE A.3-1

Cities/Unincorporated Communities in Imperial County with Populations of Over 1,000 Persons

City/Unincorporated Community	Population Figure
Brawley	19,500
Calexico	20,050
Calipatria	2,890
El Centro	32,750
Heber (2)	2,570
Holtville	5,050
Imperial	4,340
Niland	1,180
Ocotillo (2)	1,220
Seeley (2)	1,230
Westmoreland	1,440
West Shore (2)	2,670
Winterhaven	1,340

Notes:

(1) 1991 Population Estimates
(2) 1990 Population Figure
All numbers rounded to the nearest 10's.

Source: Imperial County, 1992.

approximately 30 to 35 feet, a maximum of 15 feet of excavation within the landfill footprint could occur.

In order to provide enough land for excavation of 200 million cubic yards of cover material, it is anticipated that a project site of up to 5,200 acres would be required. The availability of a site this large (5,200 acres) is therefore an additional consideration that would affect the feasibility of a potential alternative site location.

Off-site importation of 200 million cubic yards of cover material, while technically feasible, would not be desirable due to associated costs and potential transportation and air quality impacts. It is estimated that approximately 500 daily, one-way truck trips, 365 days a year, would be required to deliver cover material. If on-site clay materials do not exist, off-site importation of 7-to 8-million cubic yards of clay, or an alternative liner design, would be considered. Importation of clay materials would require an estimated 200 daily, one-way truck trips, about 60 days per year.

Individual evaluations of the six remaining regions, Regions 1A, 1B, 1C, 2, 3, and 4 are provided below.

2.1 Regions 1A, 1B, and 1C

Region 1A consists of an area that extends from the western border of Imperial County to approximately eight miles west of the Salton Sea/West Shore area (Figure A.3-12). Region 1A consists of part of Township 10 South (10S), Range 9 East (R9E) on the United States Geological Survey (USGS) Seventeen Palms 7.5-minute series quadrangle and is located approximately six miles south of the northern border of Imperial County and approximately 11 miles north of State Route (SR 78). Region 1A contains approximately 3,500 acres of land (approximately 5.5 square miles) and is smaller than the 4,300 acre proposed site.

Region 1B is located approximately four miles north of SR 78, six miles east of the Imperial County western border, and one mile west of SR 86. Region 1B contains approximately 1,680 acres of land (approximately 2.6 square miles) within T11S, R10E on the USGS Kane Spring NW 7.5-minute series quadrangle. Similar to Region 1A, Region 1B is smaller than the 4,300 acre proposed site.

Region 1C is generally located west of the Salton Sea, at the point where SR 78 and SR 86 merge. Region 1C contains 5,520 acres (8.6 square miles) of land and overlays portions of the SR 78 and SR 86 rights-of-way. Region 1C is located with T12S, R11E; T13S, R11E; T13S, R10E; and T12S, R10E on the USGS Kane Spring, Kane Spring, NW, and Kane Spring NE 7.5-minute series quadrangles.

The Department of Conservation Farmland Mapping and Monitoring Program survey boundaries do not extend north of SR 78 in the vicinity of Regions 1A, 1B, and 1C. Therefore, the analysis assumes that no agricultural lands occur in the vicinity of these regions. In addition, the Figure 1 of the Agricultural Element of the Draft Imperial county Updated General Plan, does not denote productive agricultural lands west of SR 86.

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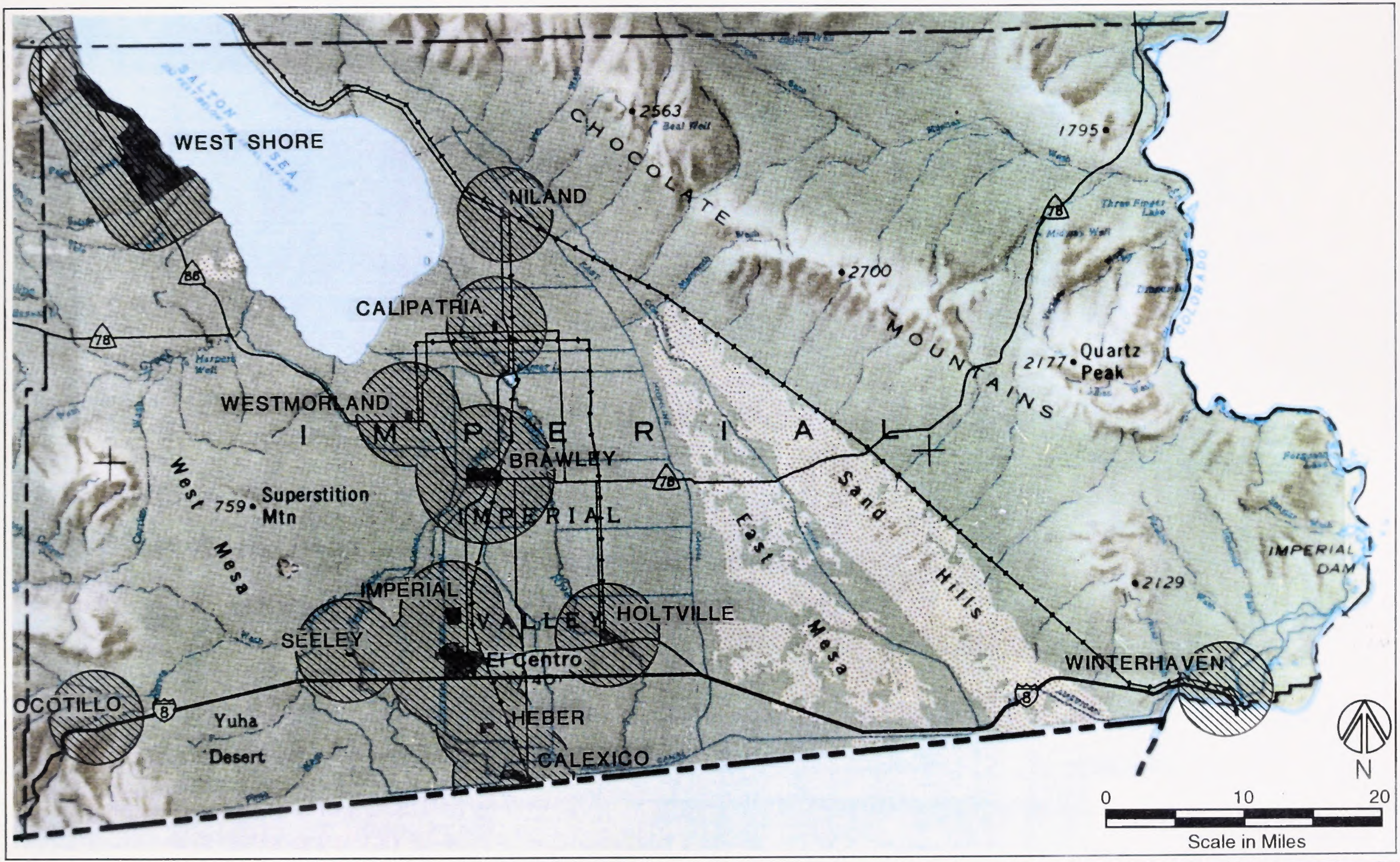

SOURCE: U.S. Census Bureau, 1990.

Basemap: USGS 1:100,000 Scale Map of California, 1971.

Proposed Mesquite Regional Landfill

Population Criteria

FIGURE
A.3-11

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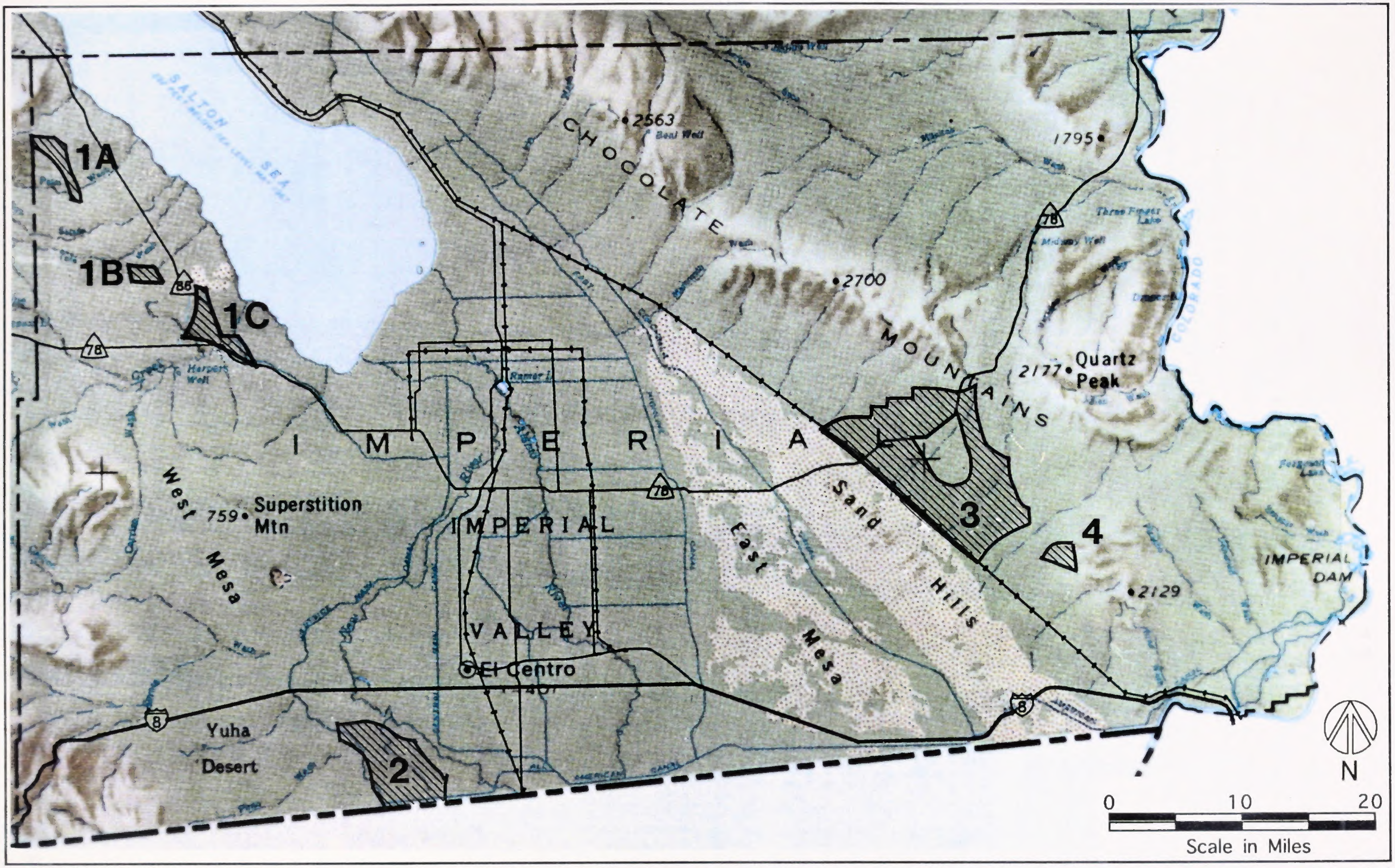

SOURCE: The Butler Roach Group, 1993.

Basemap: USGS 1:100,000 Scale Map of California, 1971.

Proposed Mesquite Regional Landfill

Remaining Regions for Alternative Landfill Site

FIGURE A.3-12

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It is not known whether clay resources exist within these regions. The United States Department of Agriculture, Soils Conservation Service published a *Soils Survey of Imperial County California, Imperial Valley Area* in October 1981 (U.S. Dept. of Agriculture, 1981). This document was consulted to attempt to determine soil types and the existence of clay resources in the remaining regions. In the vicinity of regions 1A, 1B, and 1C, the soil survey boundaries do not extend north of SR 78. The Office of the Soil Conservation Service (SCS) in El Centro was also consulted. The SCS indicated that they have no information on soils outside of the survey boundaries (pers. comm., Cameron, S., 1993). If clay resources occur within these regions, a 5,200 acre site would be required to provide sufficient on-site cover materials and clay for the landfill liner. Another option would be to consider an alternative liner design. A smaller site could be established, but would require the importation of cover materials and/or clay.

Highway access to Region 1A could be provided along SR 86, which extends southeast through the region to Brawley and eventually El Centro. Highway access for Regions 1B and 1C could be provided via SR 78 or SR 86. Rail access to this area does not presently exist, which means that a new rail spur would need to be constructed from the Southern Pacific (SP) main line located approximately 15 miles north of Region 1A, in Riverside County. Regions 1B and 1C would require a rail spur approximately 23 miles and 13 miles in length, respectively. The rail spur would be contained within an approximately 100-foot wide strip of land that would have to be purchased for the entire length. This rail spur corridor would extend through both Riverside and Imperial counties and would involve separate decision-making bodies and possibly a separate environmental review. Due to their length and proposed location, the spur could have a substantial impact on environmental resources along the corridor including sensitive land uses and cultural resources. For example, the rail spur may be extended through portions of the Torres Martinez Indian Reservation (Figure A.3-6). In addition, unless the rail spur were aligned west of Imperial County's western border, they would be aligned through an area that was identified in the Draft Imperial Count General Plan Update as being "very sensitive' for cultural resources.

In addition to the environmental impacts, the costs associated with construction of new rail spurs, a minimum of 15-miles in length, could also be substantial.

2.2 Region 2

Region 2 consists of an area located west of Calexico and southwest of El Centro (Figure A.3-12). This region is approximately 2.5 miles south of Interstate 8 and contains approximately 18,000 acres (approximately 28 square miles). Region 2 is approximately one mile west of the New River. Region 2 consists of portions of T16S, R12E; T16 1/2S, R12E; T17S, R12E; T17S, R13E; and T16S, R13E on the Heber and Mount Signal USGS 7.5-minute series quadrangles. According to the Farmland Mapping and Monitoring Program Maps complied by the California Department of Conservation (1990), this area contains both "Prime Farmland" and "Farmland of Statewide Importance." In addition, as shown on Figure 1 of the Agricultural Element of the Draft Imperial County General Plan Update, this area currently supports agricultural production (Imperial County, 1993).

It is not known whether clay resources occur within this region. If clay cannot be identified it would have to be imported, thereby increasing local traffic volumes, air quality impacts, and project costs, or an alternative liner design would have to be considered.

The Imperial County Soil Survey indicates that several soil types occur within this region, which include the following:

Map Symbol	Soil Type	Permeability
106	Glenbar Clay, wet	Moderately slow
109	Holtville Silty Clay, wet	Slow in clayey layer, moderately rapid in underlying materials
110	Holtville Silty Clay, wet	Slow in clayey layer, moderately rapid in underlying materials
114	Imperial Silty Clay, wet	Slow
115	Imperial-Glenbar Silty Clay Loams, wet	Slow
122	Meloland Very Fine Sandy Loam	Slow

Source: U.S. Department of Agriculture, 1981.

If clay resources do exist within the region, an approximately 5,200 acre site would be required to allow for the on-site excavation of these resources. The loss of 5,200 acres of prime agricultural land would be a significant loss of natural resources in Imperial County. In addition, substantial losses in farm-related employment and income would occur, potentially offsetting the economic advantages of siting a regional landfill in Imperial County.

The New River also extends through the area. Ground water in the area is typically 20 to 30 feet below the ground surface. Most of the land within Region 2 is privately owned. The CDFG Natural Diversity Database indicates that the flat-tailed horned lizard and the yellow warbler exist in the area. The flat-tailed horned lizard is listed by the U.S. Fish and Wildlife Service (USFWS) as a Category 1 species, and the yellow warbler is CDFG Species of Special Concern.

Highway access to a site in this area would occur either along Interstate (I) 8 or SR 98. The project access road would vary in length depending upon the exact site configuration. Rail access would occur along SP's Imperial County branch line, which passes through El Centro and Calexico. The rail spur would be contained within a approximate 100-foot wide strip of land. Depending upon where within Region 2 the alternative landfill site would be located, the rail spur would be a minimum of 5-miles in length and would likely be aligned through agricultural lands.

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Impacts due to rail and highway access would occur primarily to agricultural lands and the supporting irrigation canal system. Numerous culverts and crossings would need to be constructed across the various irrigation canals and a bridge would have to be constructed to cross the New River. Modification to the canals would require the approval of the Imperial Irrigation District.

Extensive modifications to the existing system of irrigation canals in the Region would be required to allow the 10-square mile site to be constructed. This would result in significant increases in project costs. In addition, site drainage systems would need to be designed to avoid the canal system. This would also require significant engineering and costs.

2.3 Region 3

Region 3 is bounded on the north by the Chocolate Mountains Aerial Gunnery Range and on the southwest by approximately Ted Kipf Road. It extends as far east as approximately Ogilby Road and its southernmost point is about 12 miles southeast of Glamis as measured along Ted Kipf Road (Figure A.3-12). Region 3 contains approximately 54,099 acres (approximately 84.5 square miles). It consists of portions of T13S, R19E; T13S, R18E; T13S, R20E; T14S, R19E, T14S, R20E on the Acolita, East of Acolita, Gables Wash, Glamis, Clyde and Hedges USGS 7.5-minute series quadrangles.

The area is generally unpopulated and is not used for agriculture. Land ownership is predominantly federal, under BLM management. The BLM designated this area Class M, for "Moderate Use." As previously discussed, new solid waste landfills are not allowed in Class M lands, and would require a transfer of ownership. The predominant uses of the area include recreation and extractive uses. Two landing strips are identified within the region as is the Vista Mine Road.

A relatively large portion of this region has been eliminated from consideration because it is mapped by Imperial County as being very sensitive with regards to cultural resources. As previously discussed, the proposed Mesquite Regional Landfill site is located within this area. Impacts to cultural resources associated with the Proposed Action, as well as appropriate mitigation measures, are described in Section 4.1.5 of the EIS/EIR. The purpose of this analysis is to evaluate areas that would avoid significant impacts associated with the proposed Action, or reduce them to below a level of significance. Therefore, this analysis focuses on other areas within Region 3 that are outside of the area mapped for "very sensitive" cultural resources.

The portion of the region that would best lend itself to development as a regional landfill would be the area closest to the existing rail line. Specifically, this area includes the northernmost portion of the region, located adjacent to Ted Kipf Road. This area would minimize the amount of new construction required to provide rail and highway access and utilities. Highway access would likely be provided from SR 78 via Ted Kipf Road. Approximately three miles of Ted Kipf Road would have to be improved to handle project-related truck trips. The road improvement may or may not require a Right-of-Way from BLM. Rail access could be provided by a short, less than one mile railroad spur from the Southern Pacific Railroad Main

Line. The rail spur would be contained within an approximately 100-foot wide strip of land and would require a Right-of-Way from the BLM. These access improvements are similar to the access improvements that would be required for the proposed site.

The Farmland Mapping and Monitoring survey boundaries do not extend east of the SP rail line. In addition, Figure 1 of the Agricultural Element of the Draft Updated General Plan does not indicate that productive agricultural land exist within Region 3. Therefore, this analysis assumes that there are no productive agricultural lands within Region 3.

It is not known whether clay resources exist in the northern most areas of Region 3. The U.S. Department of Conservation Soil Survey does not extend east of the SP rail line. If clay cannot be identified, it would have to be imported, possibly from the proposed Mesquite Landfill site. This would increase local traffic volumes, air quality impacts, and would also increase project costs; or an alternative liner design would have to be considered.

2.4 Region 4

Region 4 is comprised of approximately 2,000 acres (approximately 3.1 square miles) of primarily BLM managed land located north of Tumco and Gold Rock Ranch and northeast of the Cargo Muchacho Mountains(Figure A.3-12). This area is located within T6S, R20E on the USGS Hedges 15-minute series quadrangle.

In addition, lands owned by the State of California and a small privately held parcel are also located within this region. The region is bound on the north and west by BLM Class L lands, on the east by lands identified as being very sensitive with regards to cultural resources, and on the south by BLM Class M lands that were eliminated from consideration because of potential seismic effects. The region contains recreational uses and is bisected by Ogilby Road and an existing and planned federal electrical transmission corridor.

A 5,200 acre site could not be located in this region; due to the regions limited size. Therefore, on-site borrow would not be feasible and all cover materials would have to be imported by truck. Highway access to the area would be provided via Ogilby Road; however, because the road bisects the site, the road would have to be relocated as would the existing electrical transmission lines and the federal transmission corridor. The cost of these relocations would be substantial and would be subject to approval by various federal, state, and local agencies.

Because the site is not large enough to support on-site borrow of clay and cover materials, approximately 500 trips per day would be required to deliver cover soil and gravel. An additional 200 trips per day would be required to deliver clay approximately 60 days per year. These additional trips would constitute a long-term substantial increase in traffic along Ogilby Road and would be considered a significant environmental effect. In addition, the existence of clay resources within the region could not be verified with existing data sources (i.e., Soil Survey, Soils Conservation Service).

Rail access to the region would have to cross either BLM Class L lands or BLM Class M lands. These areas were eliminated from further consideration of an alternative landfill site

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because of potential seismic effects (Figure A.3-2). A railroad spur of at least three miles through one of these two sensitive areas would be required. BLM Multiple Use Class M lands allow railroads, and BLM Class L lands allows railroads to authorized uses provided no viable alternative is available. A railroad through the seismically sensitive lands would be susceptible to track outages in the event of a large earthquake in the project vicinity.

Portions of the region have been previously disturbed by extractive uses and the active American Girl and Padre Madre mines are located within approximately two miles of this site. According to an Environmental Impact Report that was prepared by the County of Imperial, these mines will have leach pads of up to 60 feet in height (Imperial County). Large overburden piles will not result from mining operations at these sites. It is estimated that 60 percent of the waste rock will be returned to mined-out pits (BLM and Imperial County, 1988). However, because of the large bulk and scale of a landfill adjacent to BLM Class L lands and Ogilby Road, visual impacts would be significant.

3.0 ALTERNATIVE SITE SELECTION

Based on application of the site selection criteria and further evaluation of the site evaluation criteria, a feasible alternative site for the proposed Mesquite Regional Landfill was identified within Region 3 and is shown on Figure A.3-13. Remaining regions analyzed in this appendix were found to be constrained by a number of environmental impacts that would not occur at the proposed site and may not be mitigable to below a level of significance. A description of the Alternative Mesquite Regional Landfill Site, as well as a discussion of the remaining regions is provided below.

3.1 Alternative Mesquite Regional Landfill Site

The Alternative Mesquite Regional Landfill Site is located within Region 3, approximately 3.75 miles southeast of Glamis, 1.75 miles south of SR 78, and just east of the Southern Pacific Railroad Main Line (Figure A.3-13). The Alternative Site contains portions of T14S, R19E; T13S, R19E; and T14S, R18E. The site itself consists of approximately 5,200 acres of land. The landfill footprint contains approximately 2,080 acres. Highway access would likely be provided via SR 78 and rail access could be provided via a short rail spur, less than one mile in length. The rail spur would be contained within an approximately 100-foot wide strip of land.

The impacts associated with locating the proposed Mesquite Regional Landfill at the Alternative Site are discussed in Chapters 3.0 and 4.0 of the EIS/EIR. The Alternative Site analysis assumes that only the location of the Mesquite Regional Landfill would be changed. The remaining elements of the Proposed Action, including, but not limited to, the size of the landfill, scope of operations, and the landfill life span would be similar to those identified for the proposed action.

3.2 Regions 1A, 1B, and 1C

Region 1A contains approximately 3,500 acres of land (approximately 5.5 square miles) compared to the 4,300 acres at proposed site. Region 1B contains approximately 1,680 acres of land (approximately 2.6 square miles), and Region 1C contains 5,520 acres (8.6 square miles) of land. Region 1B is smaller than the proposed landfill footprint. Based upon the application of site selection and site evaluation criteria identified in this analysis, siting the proposed Mesquite Regional Landfill within Regions 1A, 1B, or 1C would require a longer rail spur than would be required at the proposed site. These regions were eliminated from consideration primarily because the increased surface disturbance associated with the required rail spurs. In addition, a landfill in these regions could result in additional impacts to cultural resources, associated with aligning the required rail spur through areas identified in the Draft Imperial County Updated General Plan as being "very sensitive" for cultural resources. These regions may also require the importation of clay and cover materials. Region 1B would require importation of clay/cover materials because there is not sufficient land for on-site borrow.

3.3 Region 2

Based upon the application of site selection and site evaluation criteria identified in this analysis, siting the proposed Mesquite Regional Landfill within Region 2 would result in the loss of up to 5,200 acres of "Prime Farmland" and "Farmland of Statewide Importance." This is the primary reason this region was eliminated from consideration. The existing irrigation canal system in the area would also be affected by the construction of the required rail spur, a minimum of 5-miles in length. This rail spur would likely be aligned through agricultural areas which would increase the loss of agricultural land. These impacts would not occur at the proposed Mesquite Regional Landfill site.

3.4 Region 4

Region 4 contains approximately 2,000 acres of land (approximately 3.1 square miles) compared to the 4,300 acres at the proposed site and over 2,000 acre proposed landfill footprint The primary reason for eliminating this region is because of its limited size. Based upon the application of site selection and site evaluation criteria identified in this analysis, siting the proposed Mesquite Regional Landfill within Region 4 would require the development of a rail spur through a seismically sensitive area. In addition, Region 4 is not large enough to allow for the on-site excavation of cover materials and clay, should they exist within the region. The importation of such materials would result in a long-term increase in traffic volumes along Ogilby Road. These impacts would not occur at the proposed site. Siting the proposed Mesquite Regional Landfill in Region 4 could also result in significant visual impacts.

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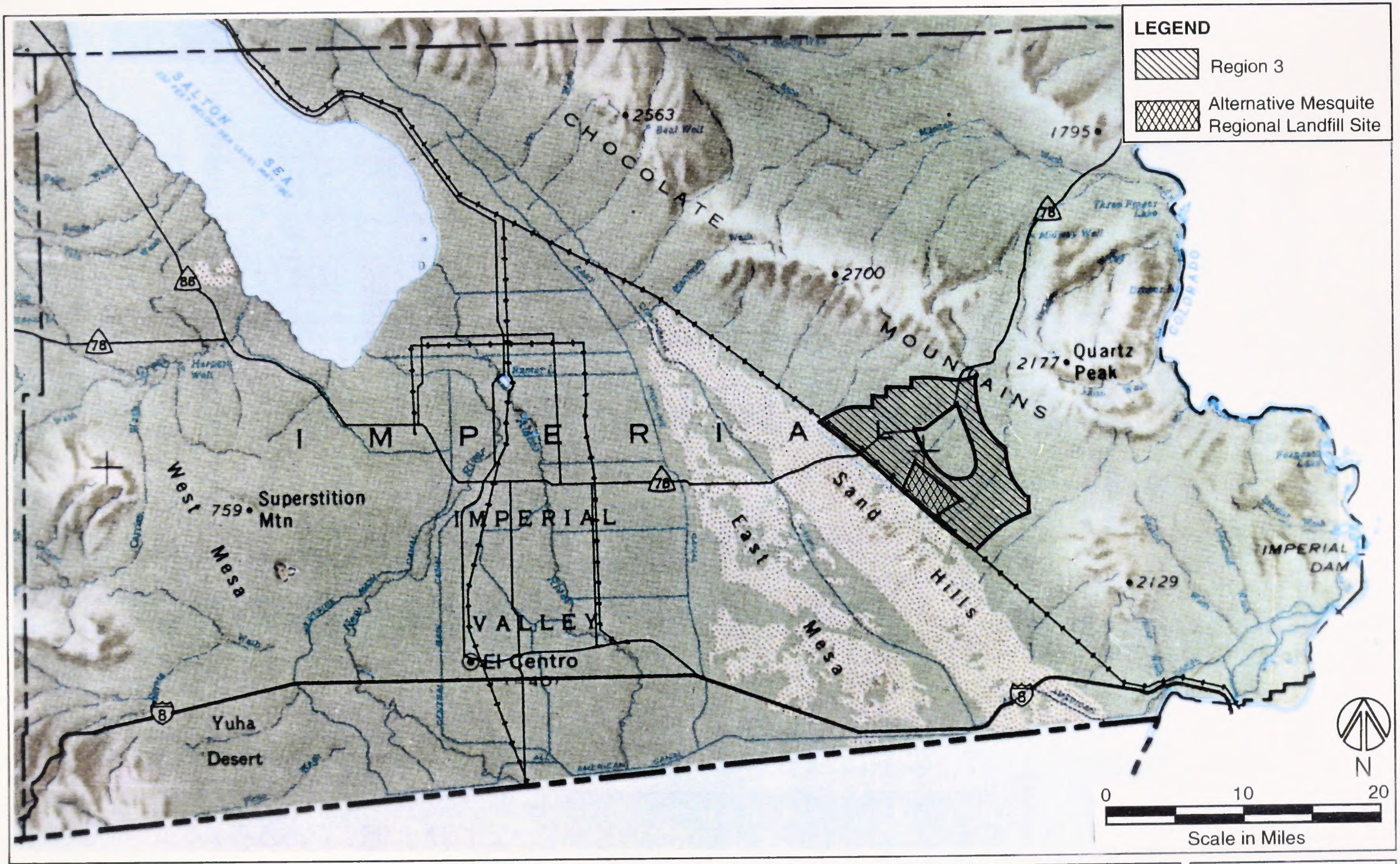

SOURCE: Environmental Solutions, Inc., 1993.

Basemap: USGS 1:100,000 Scale Map of California, 1971.

Proposed Mesquite Regional Landfill

Alternative Mesquite Regional Landfill Site

FIGURE A.3-13

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